

# LA-UR-20-20991

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Title: MSGP Stormwater Pollution Prevention Plan for: TA-03-38 Carpentry &

Metal Fabrication Shops

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Intended for: Environmental Regulatory Document

Issued: 2020-02-24 (rev.1)



# MSGP Stormwater Pollution Prevention Plan for:

# TA-03-38 Carpentry & Metal Fabrication Shops

Triad National Security, LLC (Triad)
Los Alamos National Laboratory

January 2020

**Revision 1** 

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# TA-03-38 Carpentry & Metal Fabrication Shops STORMWATER POLLUTION PREVENTION PLAN

#### **PREFACE**

This Stormwater Pollution Prevention Plan (SWPPP) was developed in accordance with the provisions of the Clean Water Act (33 U.S.C. §§1251 et seq., as amended), and the *United States Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP)* (U.S. EPA, June 2015) issued by EPA. The SWPPP uses the industry specific permit requirements for *Sector A-Timber Products and Sector AA-Fabricated Metal Products* as a guide. The applicable stormwater discharge permit is EPA General Permit Tracing Number NMR050013 [Triad National Security, LLC (Triad)]. Click here to view contents of the 2015 Multi-Sector General Permit.

This SWPPP applies to discharges of stormwater from the operational areas of the TA-03-38 Carpentry, Metal Fabrication and Pipe Fitter's Shops (collectively known as the TA-03-38 Shops) and associated Metals Fabrication Shop Satellite Storage Area (MFSSSA) at Los Alamos National Laboratory. Los Alamos National Laboratory (also referred to as LANL or the "Laboratory") is owned by the Department of Energy (DOE), and is operated by Triad. Throughout this document, the term "facility" refers to the TA-03-38 Shops. The current MSGP expires at midnight on June 4, 2020.

#### 1.0 FACILITY DESCRIPTION

#### 1.1 Facility Information

Name of Facility: TA-03-38 Carpentry & Metal Fabrication Shops						
Street: Southeast side of the intersection of West Jemez Rd. and Bikini Atoll Rd. The MFSSSA is located down Eniwetok Road east about one and a half miles on the north side.						
City: Los Alamos State: NM ZIP Code: 87545						
County: Los Alamos						
NPDES ID (i.e., permit tracking number): NMR050013						
Primary Industrial Activity SIC code, and Sector and Subsector (2015 MSGP, Appendix D and Part 8): CS: SIC 2499, Sector A, Subsector A4; MFS: SIC 3499, Sector AA, Subsector AA1; PFS: SIC 3499, Sector AA, Subsector AA1						
Estimated area of industrial activity at site exposed to stormwater: 2.44 acres						
Discharge Information						
Name(s) of surface water(s)/segment that receives stormwater from your facility: Sandia Canyon (Sigma Canyon to NPDES outfall 001)						
Does this facility discharge industrial stormwater directl (see definition in 2015 MSGP, Appendix A)?   ⊠Yes		of an "impaired water"				
Pollutants causing the impairment: Total Recoverable Aluminum, PCB (Aroclors), and Dissolved Copper						

Pollutants causing the impairment (see above) that may be present in industrial stormwater discharges from this Facility: Total Recoverable Aluminum and Dissolved Copper				
Are any of your stormwater discharges subject to effluent limitation guidelines (ELGs) (2015 MSGP				
Table 1-1)?	□Yes	⊠No		
If Yes, which guidelines apply? Not applicable.				

#### 1.2 Stormwater Pollution Prevention Team (PPT)

The Stormwater PPT for the TA-03-38 Shops consists of operations and management personnel from the Utilities and Institutional Facilities (UI) Facility Operations Division (FOD), Deployed Environmental Safety and Health (DESH), the shops, a representative from Environmental Protection and Compliance-Compliance Programs (EPC-CP), and a Deployed Environmental Professional (DEP). The EPC-CP representative is responsible for subject matter expertise to ensure Laboratory compliance under the NPDES permit regulations. The team members are selected based on their familiarity with the activities at the facility and the potential impacts of those activities on stormwater runoff.

Specific duties of individual team members within the PPT are listed in the table below.

Staff Positions	Individual Responsibilities
Team/Group Leader:  DESH-Utilities & Infrastructure Support (UIS), ESH Manager	Responsible for the management of all environmental, safety, health, and quality programs for the yards, buildings and facilities listed within this Plan. This includes performing oversight and periodic walk downs to ensure implementation of the requirements of the MSGP and this SWPPP including overseeing the assigned duties of other PPT members. The Group Leader is responsible for directing facility responsible managers to correct problems noted in inspections. The Group Leader also ensures adequate resources are obtained to ensure compliance requirements of the MSGP and this SWPPP are met.
Deployed Environmental Professionals (Primary and Backup):  DESH-UIS, Environmental Professional	Responsible for the support and oversight of all environmental programs and issues for the yards, buildings and facilities listed within this Plan. The DEP is responsible for training, recordkeeping, and SWPPP revision. The DEP ensures documentation of inspections and other required MSGP records relative to the SWPPP are managed in accordance with the Permit and established document control procedures and that the SWPPP is kept current. The DEP provides technical and regulatory support and regularly communicates with facility and operations personnel, as well as the facility PPT, regarding implementation of the MSGP and this SWPPP. Lastly, the DEP conducts routine facility inspections and if necessary, visual assessments in accordance with the Permit. Identified conditions requiring corrective actions from routine facility inspections are entered into the EPC-CP Corrective Action Report (CAR) database. The DEP is responsible for tracking and updating the status of corrective actions that cannot be implemented immediately. The DEP is also responsible for immediate and timely communication to appropriate facility and operations management personnel to ensure that they are aware of non-compliant issues within the MSGP boundary

	and that they understand immediate action is required to correct the non-compliance.
FOD Manager/Representative: Maintenance Manager, Logistics-Central Shops (LOG-CS)	Responsible for managing the maintenance and operation of all aspects of the yards, buildings and facilities listed within this Plan. The manager shall provide review and ensure coordination with core personnel and the PPT, as appropriate, when tenants within the UI FOD propose a new process, new site or operation that may be subject to the MSGP. This Manager/Representative is key to ensuring adequate communication and coordination of issues regarding implementation of the MSGP and this Plan.
EPC-CP Core:  MSGP Program Lead, Environmental Professional	The MSGP Program Lead is responsible for managing and administering the MSGP Program for all industrial facilities operated by Triad within LANL. The MSGP Program Lead advises and provides guidance to facility or operations personnel on NPDES MSGP regulations/requirements. The MSGP Program Lead also acts as the institutional point of contact for all interactions with the regulatory authority (EPA) and supervises personnel implementing stormwater monitoring requirements for the facility.
Operations Manager(s):  LOG-CS, Carpentry Shop (CS) Superintendent  LOG-CS, Metals Fabrication Shop (MFS) Superintendent	Responsible for day-to-day operations at the facility. Assists the DEPs and EPC with inspections; spill reporting; implementing, installing and maintaining stormwater controls (also known as Best Management Practices (BMPs); and providing documentation as requested by other team members. The Superintendents are key to ensuring adequate communication and coordination of issues regarding implementation of the MSGP and this Plan. These Superintendents also assist the DEP/EPC-CP with training and/or briefings as requested.
LOG-CS, Pipe Fitter's Shop (PFS) Superintendent	

#### 1.3 Site Description

The CS is located on the far southwest corner of Building 38; and the MFS and PFS are located in the northwest portion of the Building. Industrial activities and major structures at Building 38 and shop areas are shown on the site maps (Figures B-1 and B-2). The MFSSSA located on Eniwetok Dr. is shown on site map (Figure B-3).

Other operational areas (associated with the MFS) include an enclosed storage area in Building 37 Room 106 used for storing machine oil, as well as outdoor material storage areas in the western portion of the lots.

Loading docks and bays are also located on the west side of the building for all shops.

Building 38 also houses laboratory personnel in administrative offices or shops that are not part of this plan. Other facilities housed in Building 38 include a sheet metal shop, an ironworker's shop, a paint shop, a fire protection shop and an electrician's shop.

#### **Carpentry Shop**

The primary operation of this facility is the cutting of wood and fabrication of wood components for a variety of uses (primarily repair and installation jobs) around the Laboratory. All wood cutting and fabrication is performed inside the shop, located in Room 101 of Building 38. The shop interior includes administrative offices and work areas with table saws, chop saws, and wood sanders.

Outdoor activities at the facility consist of the following:

- Use of the loading docks and bays for loading and unloading materials and fabricated items.
- Recycling in roll-off bin with cover.
- Sternvent Cyclone Dust Collector with roll-off bin for the collection and disposal of wood dust and shavings.

Saws and sanders connect to the Sternvent Cyclone through ducting that suctions wood dust and shavings to the unit.

Form oil is stored inside a flammable cabinet located on the west dock and is not exposed to stormwater.

There are no satellite accumulation or less than 90 day storage hazardous waste storage areas inside or outside the Carpentry Shop.

#### **Metal Fabrication Shop**

The primary operation of this facility is fabrication of metal components for a variety of uses around the Laboratory. All metal fabrication is performed indoors.

Outdoor activities at the facility include the following:

- Use of loading docks and bays for loading and unloading materials and fabricated items.
- Metal storage in designated yard areas, metal pipe racks.
- Shop vehicle and equipment (i.e. forklift) parking.
- Roll-off bins storing scrap metal for recycle.

A Pipe Fitter's shop is located on the northwest side of Building 38, adjacent to the MFS. The shop cuts, grinds, and welds piping indoors and occasionally stores metal piping outdoors, which is covered with heavy duty tarps. For practical purposes, the Pipe Fitter's shop will be included within the industrial activities for the MFS.

#### **Outfalls**

#### **Carpentry Shop**

Outfall 073 consists of a circular grated storm drain located on the south central portion of the lot. Some stormwater flows towards the west from the Sternvent Cyclone to the outfall. Discharge runs south from the facility through TA-03 and daylights east of Building 261.

Outfall 074 consists of a circular grated storm drain located in the central area of the west parking lot of TA-03-38 and north of the CS. Most run-off from the facility drains north to this outfall. The outfall also receives a significant amount of run-on from the north and west sides of Building 38 and sheet flow from the west side of the parking area, which is not associated with stormwater discharges from the CS. The discharge runs south from the facility, through TA-03 and daylights east of Building 261.

Grab samples were collected by hand at this outfall due to heavy traffic in the area. Monitoring had previously been performed at an automated monitoring station located at Outfall 073 (adjacent to the Sternvent Cyclone), however there was not enough runoff at this location to collect a sufficient sample volume.

Outfall 073 has been determined to be substantially identical to Outfall 074 based on common potential pollutant sources, drainage areas, activities within the drainage areas, and general site topography and characteristics. The estimated runoff coefficient for drainage areas specific to Outfall 073 and 074 is 0.95

#### **Metal Fabrication Shop and Satellite Storage Area**

Outfall 076 receives drainage from the fenced metal storage yard at the northeast portion of the yard. The outfall area is paved with asphalt. An asphalt berm installed around the perimeter of the fenced storage yard prevents run-on from impacting the site and acts to manage and divert run-off towards the MetalLoxx® wattles and Outfall 076. MetalLoxx® wattles installed at the outfall are designed to capture and filter heavy metals and slow stormwater runoff from the yard. Monitoring samples of stormwater discharge are collected with automated samplers identified as **MSGP07601** on the site map (see Figure B-2). Outfall 076 is the sole outfall for the MFS. Discharge is to Sandia Canyon via storm drain drop inlets that are located in the west parking lot of Building 38, and east of the fenced metal storage yard. The storm drain system discharge pipe runs south from the facility, through TA-03 and daylights east of Building 261.

**Note:** In 2019, the monitored outfall was changed from MSGP00201 at the drop inlet west of SM-38 to its current location at the fenced metal storage yard. This was determined to be the primary location exposed to precipitation for industrial activity associated with the Metal Fabrication Shop. Monitoring at this location provides a more representative sample of potential pollutants associated with industrial activity for the MFS by eliminating excess run-on from the adjacent parking lots, which are not associated with industrial activity.

Outfall 077 is located at the northeast corner of the facility, the outfall is designed to capture all of the runoff from the MFSSSA. The outfall area is stabilized with rock to minimize erosion. Before discharging into Sandia Canyon, runoff generated from the raw material storage area is managed by a rock berm that directs flows to Outfall 077. Stormwater discharge is monitored with automated sampler **MSGP07701** at this representative monitoring location (see Figure B-3).

#### 1.4 General Location Map

The general location map for the facility can be found as Figure A. Figures B-1, B-2, B-3 and B-4 contain all site maps and receiving waters associated with stormwater discharges from the TA-03-38 Shops and MFSSA. 100% of the site flows to Sandia Canyon. The canyon at this location is a perennial stream and eventually flows into the Rio Grande approximately 10 miles southeast of the site.

#### 1.5 Site Map

The site maps provided as Figures B-1, B-2 and B-3 illustrate the facility's activities: including facility boundaries, structures, impervious surfaces, industrial activity areas, spills, operational areas, drainage patterns, stormwater controls, monitoring locations, outfalls, and nearby receiving waters.

As required by the 2015 MSGP, the following information specific to the facility is either shown on the site map or contained within additional information provided in this SWPPP.

- Site boundaries and acreage. The site covers approximately 2.44 acres (total).
- **Significant structures and impervious surfaces.** The CS is 100 %, MFS is 100 % (primarily due to paved lots and structures) and the MFSSSA is 0% impervious.
- **Direction of stormwater flow and site drainage.** Direction of flow is indicated with arrows.
- Locations of stormwater control measures. Control measures are identified numerically.
- Locations of all receiving waters. Stormwater discharges to Sandia Canyon (Sigma Canyon to NPDES outfall 001) which is an impaired water. There is no TMDL for Sandia Canyon. A map of nearby receiving waters is provided as Figure B-4.
- Locations of all stormwater conveyances. This includes all ditches, pipes, and swales.
- Locations of potential pollutant sources.
- Locations of significant spills or leaks.
- Locations of all stormwater monitoring points.
- Locations of stormwater inlets and outfalls. Each outfall has a unique identification code for (e.g., Outfall 074, 073, etc.). These two outfalls are substantially identical.
- This facility is not currently associated with a municipal separate storm sewer system (MS4).
- Areas of designated critical habitat for endangered or threatened species. There are none in the direct vicinity of the TA-03-38 Shops. The MFSSSA is within critical habitat areas. A map for threatened and endangered species within LANL property is included as Figure B-4.
- There are no non-stormwater discharges at the facility (see certification in Attachment 3)
- Locations of the following activities where such activities are exposed to precipitation:
  - loading/unloading areas;
  - o locations used for the treatment, storage, or disposal of waste;
  - processing and storage areas;
  - o immediate access roads used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility;
  - o machinery; and
  - o locations and sources of run-on to the site.

#### 2.0 POTENTIAL POLLUTANT SOURCES

Industrial activities that could potentially result in releases of pollutants to the environment are summarized in Section 2.1 below. The site maps for the TA-03-38 Shops are in Figure B-1, B-2 and B-3.

#### **Carpentry Shop**

Most industrial activities at the TA-03-38 CS occur indoors where materials are not exposed to stormwater. Potential stormwater pollutants involve materials stored outdoors: primarily finished or scrap wood materials, wood shavings; and associated outdoor activities such as loading/unloading materials at the shop bay and vehicle parking. Vehicle parking is limited to areas adjacent to the lower west boundary of Building 38. The loading dock is located on the west side of the shop and is primarily used to transport wood and associated work materials to Carpentry vehicles for delivery to jobsites throughout the Laboratory. The remainder of the lower west parking lot is used for other government vehicle/craft parking and is not exclusive to the CS. The upper west lot is used for general employee parking for Building 38 and adjacent buildings.

#### **Metal Fabrication Shop**

Most industrial activities at the MFS take place indoors, where materials are not exposed to stormwater. Potential stormwater pollutants involve facility materials stored outdoors. These primarily include finished or raw metal stock, scrap metals or metal shavings that may contain residual cutting oils and outdoor activities such as loading/unloading materials at shop bays and vehicle/forklift parking.

The primary metal storage yard (located on the southwest side of the outdoor lot) is enclosed by a chain link fence and locked gate. The yard contains five covered metal storage racks and a covered bin for the temporary storage of scrap metal for recycling. Large pieces of scrap metal are stored on wooden pallets and kept covered with heavy-duty (28 mil.) tarps. A garbage dumpster and a cardboard recycling dumpster, both covered, are positioned on the north side of the outdoor lot.

The satellite storage yard (MFSSSA) located on the North side of Eniwetok Dr. contains metal storage racks for pipe and other miscellaneous metals. Raw materials are covered with tarps and runoff is managed by a rock berm installed around the northern perimeter of the site.

Machine oil is stored on secondary containment units inside TA-03-37-0106, a fully enclosed storage building, where it is not exposed to stormwater.

Vehicle parking is limited to areas adjacent to the north boundary fence line and west of Building 38. Forklifts are parked inside and occasionally outside on the west end of Building 38. Loading docks and bays on the west and southwest side of the facility are primarily used to transport metal stock or finished metal products to and from the shop.

The Pipe Fitter's shop, adjacent to the MFS, occasionally stores piping outside at the north fence line.

#### 2.1 Potential Pollutants Associated with Industrial Activity

Industrial activities that could potentially result in releases to the environment are summarized in 2.1 below by shop.

# **Carpentry Shop**

#### Sternvent Cyclone/Wood Shavings Roll-Off Bin

Potential pollutants include wood dust and shavings that could mobilize in stormwater.

#### Wood for Reuse/Recycle Roll-Off Bin

Potential pollutants include wood dust and shavings that could mobilize in stormwater.

# **Loading Docks**

Potential pollutants include form oil or chemicals being transported by carpentry personnel.

#### **Vehicle Parking**

Potential pollutants include leakage of fuel, oil, grease or hydraulic fluids.

#### **Trash Dumpsters**

Potential pollutants include trash, debris, plastics, food, and cardboard, which can get blown around the parking lot or carried out of the dumpster by birds or other wildlife.

#### Solid Waste Management Units (SWMUs) or Consent Order Sites

There are no SWMUs or Consent Order Sites (from legacy waste/operations) within the boundary of the CS.

#### **Metal Fabrication Shop**

#### **Covered Metal Raw Material Storage Area (Metal Storage Yard)**

Potential pollutants include metals exposed to precipitation (rust).

# **Covered Metal-Recycle Roll-Off Bin**

Potential pollutants include processed metal chips, turnings, small metal pieces, and cutting oil residues (if leakage occurred from the roll-off bin).

#### Pipe Storage Racks (Metal Storage Yard)

Potential pollutants include metal pipe exposed to precipitation (rust).

#### **Vehicle Parking**

Potential pollutants include leakage of fuel, oil, or hydraulic fluids.

#### **Forklift Storage**

Potential pollutants include leakage of fuel, oil, or hydraulic fluids.

#### **Dumpsters Containing Trash and Cardboard**

Potential pollutants include trash, debris, plastics, food, and cardboard, which can get blown around the parking lot or carried out of the dumpster by birds or other wildlife.

#### Solid Waste Management Unit (SWMU) or Consent Order Site

One SWMU is located within the boundary of the MFS at the southeast corner of the fenced metals storage yard. It is not included as part of the LANL NPDES or Individual Permit (IP) for SWMUs at the Laboratory covered under Sector K.

SWMU 03-013(i) consists of soil and gravel contaminated from historical releases of hydraulic oil at the former locations of Buildings 03-246 and 03-247, which were used to test the tensile strength of various steel cables used in conjunction with underground nuclear test assemblies. The Facility was constructed prior to 1967 and was operated until the mid-1980s when a replacement Facility was constructed on Sigma Mesa. Building 03-246 was a corrugated metal building constructed on a concrete slab and contained the controls for the pull test equipment, as well as a hydraulic oil compressor and storage tank. Building 03-247 was a corrugated metal building constructed on a concrete curb surrounding a gravel floor and contains two hydraulic rams used to perform the tensile strength testing. Hydraulic oil

was provided to the rams through underground pipes between Buildings 03-246 and 03-247. The contamination identified at SWMU 03-013(i) consisted of oil-stained soil around Building 03-246 and oil-stained gravel inside Building 03-247. At the former location of Building 03-246, hydraulic oil appears to have been released to the concrete slab floor inside the building and to have subsequently flowed beneath the building walls and onto the soil surrounding the building. Visible soil contamination existed along the north side of the building and along the northeast and northwest corners. The gravel floor inside Building 03-247 was visibly stained with oil in several locations beneath the hydraulic ram assembly.

**Note:** Both Buildings 03-246 and 03-247 were decommissioned and removed during the summer of 2004. While they are no longer present, SWMU 03-013 (i) was established to monitor and remediate spills that did occur while those two buildings were used to house test equipment.

SWMU 03-013(i) was not included in the 1990 SWMU Report or the OU1114 RFI Work Plan, but was discovered in 2004 during planning for the demolition of Buildings 03-246 and 03-247. Two samples of the oil-stained soil adjacent to the former location of Building 03-246 were collected by the Laboratory's Solid Waste Regulatory Compliance Group in 2004 and analyzed for inorganic chemicals, organic chemicals, PCBs, and total petroleum hydrocarbons (TPH). Four inorganic chemicals (cadmium, copper, lead, and zinc) were detected above BV, but below SALs. TPH was also detected, but no organic chemicals or PCBs were detected. Oil-stained soil was removed when the two buildings were demolished and confirmation samples were collected by the ER Project. This SWMU is being proposed for no further action (NFA) and is not a potential pollutant of concern in regard to the TA-03-38 MFS.

#### 2.2 Spills and Leaks

Spills and leaks that have occurred in the past year (2019) are listed below. Spills and leaks that occurred prior to 2019 are documented in previous SWPPP revisions under Los Alamos National Security, LLC (LANS).

Date	Description	Outfall(s) Affected
September 2019	West of the TA-03-38 Metals Fab Shop, a release from a	None
	plastic container (1 liter poly) occurred. Emergency	
	Operations and HAZMAT responded. A lid for the	
	container was not visible in the area. HAZMAT	
	characterized the material as wet soil and gravel. After	
	wiping off the container a label was visible indicating the	
	contents to be a soil sample. It is unknown at this time	
	where the sample originated.	

Information on areas where spills and leaks could occur at the TA-03-38 Shops is provided below by shop location.

#### **Carpentry Shop**

Location	Outfalls (see site map)
Loading Dock	074

Location	Outfalls (see site map)
Stervent Cyclone	074
Wood Reuse/Recycle Roll-Off Bin	074
Parking Lot	073 & 074
Product/Chemical Storage Area	074

#### **Metal Fabrication Shop**

Location	Outfalls (see site map)
Metal Storage Yard and Covered Metal Recycle Roll-Off Bin	076
Vehicle Parking	N/A
Forklift Storage	N/A
Loading and Unloading Operations	N/A
Pipe Fitter's Shop	N/A
MFSSSA Raw Material Metal Storage	077

In the event of any future spill or leak at any of the facility areas, a spill report, documenting the occurrence and the nature of the spill or leak, will be completed. The spill report will be filed promptly upon completion and documentation of the spill clean-up, and will be summarized in this section of the SWPPP.

The probability of spills or releases at the facility is minimized by the application of good housekeeping procedures and appropriate operational methods. Spill protection and clean-up materials are readily available on site. Appropriate response measures for a spill or release of hazardous materials are applied when addressing spills. The specific spill response and cleanup procedures depend on the nature of the spilled material. Specific spill response and reporting procedures for LANL are listed in Section 3.1.4 of this SWPPP.

#### 2.3 Unauthorized Non-Stormwater Discharges

There are no NPDES permitted non-stormwater discharges or unpermitted outfalls associated with the facility. Potential sources of non-stormwater discharges at the facility include the testing of fire hydrants in the area. All wastewater drainage within the building discharges to the Sanitary Wastewater System.

The "Non-Stormwater Discharge Assessment and Certification" is located in Attachment 3. This form certifies that all stormwater outfalls have been evaluated for the presence of non-stormwater discharges. The form is updated whenever a change in possible non-stormwater discharge is determined.

# 2.4 Salt Storage

No salt storage or piles containing salt are present at the facility. There is no salt storage anticipated for this facility as part of an industrial activity.

# 2.5 Historical Data Summary

The following tables provide sampling data at the facility for the past year (2019). Prior to November, 2018, LANL was operated by LANS.

MSGP Stormwater Pollution Prevention Plan Revision 1, January 2020

# Permitted Facility: TA-03-38 Carpentry Shop

# CY2019

Monitored Outfall	Discontinue Monitoring		Continue Monitoring				
	Average of four monitoring values did not exceed benchmark; quarterly monitoring discontinued per Section 6.2.1.2	Impaired water constituent was not detected in storm water discharge; annual monitoring discontinued per Section 6.2.4.1.	Fewer than four quarterly samples have been collected in current sequence. Average concentration is not mathematically certain to exceed benchmark.	Average concentration mathematically certain to exceed benchmark.	Average of four quarterly monitoring values exceeded benchmark.	Impaired water constituent was detected, but did not exceed New Mexico Water Quality criterion.	Impaired water constituent exceeded New Mexico Water Quality criterion.
074	COD, TSS	Total Aroclor	_	_	_	Al, Cu	_

# Permitted Facility: TA-03-38 Metal Fabrication Shop

# **CY 2019**

Monitored Outfall	Discontinu	ue Monitoring	Continue Monitoring						
	Average of four monitoring values did not exceed benchmark; quarterly monitoring discontinued per Section 6.2.1.2	Impaired water constituent was not detected in storm water discharge; annual monitoring discontinued per Section 6.2.4.1.	Fewer than four quarterly samples have been collected in current sequence. Average concentration is not mathematically certain to exceed benchmark.	Average concentration mathematically certain to exceed benchmark.	Average of four quarterly monitoring values exceeded benchmark.	Impaired water constituent was detected, but did not exceed New Mexico Water Quality criterion.	Impaired water constituent exceeded New Mexico Water Quality criterion.		
002	-	Total Aroclor	Al, NO3+NO2-N, Zn	Fe	_	Al	Cu		
076	_	Total Aroclor	NO3+NO2-N	Al, Fe, Zn	_	_	Al		

# Permitted Facility: TA-03-38 MFSSSA

#### **CY 2019**

Due to the addition of a new raw material storage area for the PFS, monitoring for outfall 077 will start in April, 2020.

#### 3.0 STORMWATER CONTROL MEASURES

Control measures at the facility are designed to minimize the potential for spills, releases, exposure of materials, or any other events that could adversely affect the quality of water and sediment that may be transported out of the area by stormwater runoff.

Proper material management and storage minimize the potential for exposure of precipitation and runoff to potentially hazardous materials. Containers that could be susceptible to spillage or leakage are plainly labeled (e.g., "Used Oil," "Spent Solvents," etc.). Most operations are performed indoors, and materials are stored indoors or outdoors in covered or enclosed structures. The potential for exposure of industrial materials to stormwater is limited primarily to loading/unloading operations at outdoor dock areas and yards, leaks from the transfer of machining oil from TA-03-37-0106 to the shops, leakage of oil from the metal recycle roll-off bin, or from vehicle parking in the west lots. Adequate secondary containment is provided for oil containing equipment.

#### 3.1 Non-Numeric Technology-Based Effluent Limits

Part 8 of the 2015 MSGP identifies sector-specific requirements for **Sectors A and Sectors AA** in addition to the general non-numeric limits outlined in this section. The facility must comply with requirements associated with the primary industrial activities described in Section 1.3 of this SWPPP and any colocated industrial activities as defined in Appendix A of the 2015 MSGP. The sector specific requirements only apply to those areas of the facility where the sector-specific activities occur.

The following sector-specific non-numeric effluent limits are addressed at this facility and identified by shop.

#### **Carpentry Shop**

#### **Good Housekeeping**

(See Section 3.1.2).

#### **Drainage Area Site Map**

(See Sections 1.3, 1.5 and Figure B-1).

#### **Inventory of Exposed Materials**

(See Section 2.1). This facility does not use or store chlorophenolic, creosote, or chromium-copperarsenic formulations for wood surface protection/preserving. There are no known areas of contamination associated with these chemicals at the facility.

#### **Description of Stormwater Management Controls**

(See Section 3.1.1).

#### **Additional Inspection Requirements**

This facility does not perform wood surface protection and preservation activities. However, routine facility inspections are conducted monthly at the site as described in Section 4.6.1. There are no areas at the Carpentry Shop where spray-down of lumber or wood products takes place.

#### **Metal Fabrication Shop**

#### **Raw Steel Handling Storage**

Most of the handling and all fabrication/processing occurs inside the MFS. All shavings, chips, turnings, and iron dust resulting from fabrication activities are contained in receptacles below each piece of machinery. Receptacles are emptied into bins located throughout the MFS. Once the bins are full of metal chips, turnings and small metal pieces, they, along with larger metal scrap pieces are emptied into the outside covered metal recycle roll-off bins located in the fenced metal storage yard. Scrap metal from Pipe Fitter's and other miscellaneous fieldwork is placed in the covered metal recycle roll-off bin located outdoors at the east side of the Pipe Fitter's Shop at TA-03-38, Room 104. Excess piping and other metals are either placed on covered elevated racks or on pallets covered with tarps in the northwest metals storage yard. Pipe Fitter's covered storage racks are located at the MFSSSA. No wastes are disposed on-site.

#### **Metal Fabricating Areas**

All areas are enclosed and maintained daily to ensure all chips, turning, and iron dust is contained. Areas around all machinery are swept and inspected daily for spills. Oil absorbent for dry cleanup is readily available in the event of leakage, and all hydraulic shear and rolling machines are equipped with equipment shields.

#### **Storage Areas for Raw Metal**

The primary outside metal storage area is the metal storage yard. Some metal or piping may be stored on a pallet covered with tarps within the metal storage yard. Most metal is stored on covered racks. Additional storage area containing pipe storage racks and miscellaneous metal storage, is maintained in a neat, orderly state at the MFSSSA. All raw metals stored at the site are covered with tarps.

<u>Metal Working Fluid Storage Area</u> Cutting and drilling fluids and oils used at the facility are stored in Building 37, Room 106. The room is fully enclosed and drums are stored on secondary containment. This area is not exposed to precipitation.

#### **Cleaners and Rinse Water**

All rinse water and cleaners are located or stored inside to prevent stormwater contamination. Floor drains have either been closed or rerouted to the sanitary sewer system.

#### **Lubricating Oil and Hydraulic Fluid Operations**

All operations occur inside to prevent stormwater contamination. In the case of temporary outdoor storage, secondary containment is utilized for lubrication oils in 55 gallon drums. Metal recycle roll-off bins are covered to prevent stormwater from contacting metal chips and turnings with cutting oil residue.

#### **Chemical Storage Areas**

Any chemicals (including paints) used in the shop are stored inside buildings inside flammable cabinets if necessary. Chemical items are labeled appropriately and are inventoried annually through LANL's Chemlog (barcode) tracking system.

#### **Spills and Leaks**

A detailed description of spill prevention and response procedures is included in Section 3.1.4. The probability of spills or releases at the facility is minimized by the application of good housekeeping procedures and appropriate operational processes. Operational processes include use of drum dollies and drum grapplers on the forklifts for unloading and reloading.

There are no areas at this facility where chemical formulations are sprayed to provide surface protection; and no stormwater discharges associated with this type of activity.

#### 3.1.1 Minimize Exposure

Control measures at the facility are designed to minimize the potential for spills, releases, exposure of materials, or other events that could adversely affect water quality and sedimentation/erosion.

Most operations and storage areas are located within structures, so that the potential for exposure to stormwater is limited to the loading/unloading areas, the metal storage yard, and vehicle parking areas. When leaky vehicles or equipment are identified during daily or routine facility inspections, absorbents are applied until the vehicle or equipment is removed from the facility for maintenance or repair. Micro-Blaze® is sprayed on asphalt or concrete after all liquids have been absorbed. Locations for spill cleanup kits and spill response materials are described in Section 3.1.4 of this SWPPP. There are no hazardous waste storage areas associated with the shops. All major wood cutting and metal fabrication activities occur inside. Specific structural controls are listed below:

### **Carpentry Shop**

#### Sternvent Cyclone/wood shavings roll-off bin

Wood shavings from shop saws and sanding equipment are kept fully enclosed and stored in the Sternvent Cyclone compartments. When the compartments are full they are emptied into the roll-off bin located directly below the Sternvent Cyclone. The roll-off bin is kept covered except when the Sternvent Cyclone compartments are emptied.

#### Roll-off bin for scrap wood

The roll-off bin is equipped with a rolling cover and is kept covered when not in use. The bin and its contents are removed for disposal once the bin becomes approximately 3/4 full.

#### **Spill Control**

Craft vehicles are monitored on a regular basis for leaks and checked during monthly routine facility inspections. If spills or leaks are found, absorbent materials are immediately used to contain the leak. The spill procedures listed in Section 3.1.4 is also followed.

#### **Flammable Cabinet**

Form oil is kept enclosed in a flammable storage cabinet located on the west loading dock. The loading dock area is roofed and the flammable cabinet is not exposed to stormwater.

#### **Trash Dumpsters**

Trash dumpsters (adjacent to the facility) are kept closed when not in use and dumped on a regular basis. Dumpsters are kept in good condition and are repaired or replaced, if needed, by Roads & Grounds.

#### MetalLoxx® Wattle

This control is installed around the wood shavings roll-off bin to filter out metal residuals in stormwater runoff.

#### **Metal Fabrication Shop**

#### **Covered Metal Recycle Roll-Off Bins**

Metal chips and turnings and scrap metal are placed inside covered roll-off bins which are shipped off site for recycle on a routine basis.

#### **Covered Metal and Pipe Storage Racks**

Metal raw material, pipe and finished/fabricated metal parts are stored on elevated racks to prevent direct contact with stormwater runoff. Where it is not feasible to store metal materials on covered racks (due to size, weight, etc.), the metal is stored off-ground on pallets and covered with sturdy, 28 mil tarps that are manufactured to last 25 years.

#### **Spill Control**

Parking areas are frequently inspected for leaks and checked monthly during routine facility inspections. Oil absorbent is available in the MFS for containment if needed. Forklifts are parked inside on most occasions to reduce the potential for exposure to stormwater. Maintenance on forklifts is performed off site at the Heavy Equipment Shop.

#### Petro-Plug® Oil Barrier

The Petro-Plug® oil barrier is installed at the end of the drain pipe that discharges excess stormwater from the trench drain/sump pump outside the Pipe Fitter's shop. The Petro-Pipe prevents any oil that may accumulate in the trench drain from being discharged. Pumping of the trench drain is required to prevent flooding of the adjacent shop. The Petro-Pipe is replaced every year. The replacement of this control is logged in Attachment 10 as maintenance.

#### **Berms (Run-on Control)**

Mixed asphalt millings/earthen berms along Bikini Atoll Road and West Jemez Road prevent stormwater run-on to the MFS and PFS from adjacent roadways. An asphalt berm was installed around the outdoor metal storage yard in 2019 to prevent run-on and to channel all stormwater to the monitored outfall and stormwater controls. A rock berm is located along the northern perimeter of the MFSSSA. This berm manages runoff, prevents offsite sediment migration, and directs flows to the outfall and automated sampler. Whenever these berms need repair, they are identified as a condition requiring corrective action on the routine facility inspection form and entered into the EPC-CP CAR database and repaired.

#### **Trash Dumpsters & Cardboard Recycle Dumpsters**

Trash dumpsters and cardboard recycle dumpsters (adjacent to the facility) are kept closed when not in use and dumped on a regular basis. Dumpsters are kept in good condition and are repaired or replaced, if needed, by Roads & Grounds.

#### **MetalLoxx® Wattles**

Wattles are used to filter out metal residuals in stormwater runoff. Currently two wattles are installed at the outfall location for the metal storage yard. Wattles are replaced quarterly. Replacement of these wattles will be logged in Attachment 10. When replacement of wattles is noted on the routine facility inspection form, with installation dates, this information is tracked in the Maintenance Connection database.

#### 3.1.2 Good Housekeeping

Good housekeeping practices specifically applicable to the prevention of stormwater contamination are identified below.

Site areas exposed to precipitation, including outfalls, are inspected during periodic walk downs to ensure grounds are kept in an orderly condition. Floatable debris, garbage, waste, sediments and other pollutant-carrying items are removed.

West parking areas are swept monthly with the vacuum sweeper to reduce sediment accumulation.

Areas around the Sternvent Cyclone and the wood shavings roll-off bin are inspected and swept monthly or sooner if needed to keep wood dust and shavings from mobilizing with stormwater.

Trash and debris is disposed of in covered trash dumpsters. The trash dumpsters are serviced by Roads and Grounds on a weekly basis.

Outdoor metal storage areas at the MFS, PFS and MFSSSA are monitored to ensure metal and pipe is stored properly off the ground on storage racks and is covered. Large scrap metal is elevated and stored on pallets or contained inside a covered metal recycle roll-off bin within the metal storage yard at the MFS. Small metal pieces, chips and turnings may be contained in a closed metal drum within a larger roll-off bin or placed in a small covered 10 cubic yard scrap metal roll-off bin. Receptacles used to collect chips, turnings and small metal pieces are emptied into bins within MFS, which are then transferred to the larger bins outside.

Metal recycle roll-off bins are covered and monitored to ensure they are scheduled for pickup by the Material Recycling Facility (MRF) when they are 3/4 full.

Loading docks, storage sheds, vehicle loading and forklift parking areas are inspected for signs of spills or leaks. All spills and leaks are cleaned-up immediately per Section 3.1.4 of this SWPPP. Government vehicles and equipment found leaking fluids are removed immediately and sent to the Heavy Equipment Shop for maintenance.

#### 3.1.3 Maintenance

Control measures at the facility are kept in effective operating condition by implementing scheduled preventive maintenance, standard operating procedures (SOPs), engineering guidance, and manufacturer's specifications as applicable. If control measures need to be replaced or repaired to maintain compliance with the 2015 MSGP, necessary modifications are made according to the timelines specified in the *Corrective Actions and Deadlines* requirements of Section 6.0 of this SWPPP.

Deficient items (i.e., conditions requiring corrective action) identified during monthly routine facility inspections or other walk downs are documented on the inspection form and entered into the CAR database. The CAR will remain open until proper maintenance or corrective action has been completed. CAR information along with documentation of repair of control measures is kept on file in Attachment 9 of the SWPPP.

Maintenance like monthly sweeping, emptying roll-off bins when 3/4 full, replacing MetalLoxx® wattles every 3 months and replacing the Petro Plug every year are documented in the *Scheduled Maintenance Log* contained in Attachment 10.

#### 3.1.4 Spill Prevention and Response

Spills, leaks, or releases are prevented and minimized by the application of good housekeeping procedures, BMPs, and engineering/administrative controls. Containers that could be susceptible to spillage or leakage are plainly labeled (e.g., "Used Oil," "Spent Solvents," etc.) to encourage proper handling and facilitate rapid response if spills or leaks from these containers should occur. Spill cleanup materials are located inside Building 38 at the MFS and at the MFSSSA. Micro-Blaze® is kept in the DEP office at TA-03-1437.

All spills or releases are reported to EPC-CP by using the spills pager (505) 664-7722. Although incidental spills may be cleaned up by facility personnel, all emergency spills or releases are reported to Emergency Management Division-Emergency Response (EMD-ER) and/or the Facility Duty Officer by calling 667-2400. If fire or explosion is present, or if the potential for such exists, the situation must be reported by dialing 911 from a non-cellular phone or by activating a fire pull box. In the event of a spill, EMD-ER will coordinate appropriate cleanup procedures and EPC-CP will notify the individuals or organizations responsible for completing spill reports and providing information needed to fulfill regulatory reporting requirements.

Unauthorized releases or discharges within industrial facility boundaries are entered into the CAR database in accordance with EPC-CP-QP-022, MSGP Corrective Actions. In addition, the completion of an Unplanned Release Report is required in the event of a spill. The report will be submitted to EPC-CP personnel and handled according to internal spill record keeping procedures. Spills may be "reportable" (requiring external agency notification) depending on the nature of the spilled material and the location of the release. External agency notification may consist of verbal and/or written notification to the National Response Center, Environmental Protection Agency Region VI, or the New Mexico Environment Department (NMED). EMD-ER, the FOD and EPC-CP, in accordance with Laboratory and DOE policies and federal and state regulatory reporting requirements, will make the determination for the type of reporting required. EPC-DO-QP-101, Environmental Reporting Requirements for Releases or Events is used for this purpose (see Attachment 21).

Copies of internal spill reports are maintained by the responsible organization and in the EPC-CP database. The EPC-CP procedure for spill reporting and response, ENV-CP-QP-007, *Spill Investigations*, can be found in Attachment 22 of this SWPPP.

#### 3.1.5 Erosion and Sediment Control

#### **Carpentry Shop**

The entire outside area of the CS is paved with asphalt and concrete; therefore, erosion and sediment transport from the site is unlikely. Areas to the south and southeast of the site are stabilized with rock. Vacuum sweeping the west lot at the shop is performed monthly, except when snow would prevent it. Regular vacuum sweeping reduces sediment accumulation on site and transport of associated pollutants.

#### **Metal Fabrication Shop**

The entire outside are associated with the shop, except for small plots of grass adjacent to the buildings, is paved with asphalt and concrete; therefore, erosion and sediment transport is unlikely. A mixed asphalt millings and earthen berm along Bikini Atoll Road and West Jemez Road prevents run-on to the shop's lot from adjacent roadways. Vacuum sweeping of the west lot at the MFS is done monthly except when snow prevents it. Regular vacuum sweeping reduces sediment accumulation on site and transport

of associated pollutants. The potential for sediment migration from the covered raw metal storage areas located west of TA-03-38 is minimized by the asphalt berm installed around the perimeter of the area and MetalLoxx® wattles installed at Outfall 076.

The entire surface of the MFSSSA is stabilized with rock or gravel mulch which acts to prevent erosion and promote infiltration. The rock berm along the northern perimeter of the site manages sediment by reducing the potential for offsite sediment migration.

#### 3.1.6 Management of Runoff

#### **Carpentry Shop**

The majority of stormwater runoff from outdoor industrial activity areas at the facility is captured by the grated storm drains (Outfalls 073 and 074), which are located west of Building 38 as described in Section 1.3.

All onsite and offsite storm drains at the facilities connect to a common storm system and common outfall which daylights into a tributary of Sandia Canyon.

A significant amount of run-on to the facilities was occurring from the drainage area adjacent to the concrete walkway at the upper southwest boundary of the facilities. This area was stabilized with rock, and an asphalt berm was installed along the edge and corner of the upper parking lot in September 2015.

#### **Metal Fabrication Shop**

Stormwater runoff from the facilities outdoor industrial activity areas is captured by 4 grated storm drains located on the west side of Building 03-38. In the event of a stormwater backup at the grated (trench) drain west of the Pipe Fitter's shop, the sump-pump discharges stormwater north, onto West Jemez Road. This is necessary to prevent the Pipe Fitter's shop from flooding.

Run-on generated from the paved area west of the metal storage yard is diverted around the metal storage yard into the grated storm drains located on the west side of Building 38. Runoff from the metal storage yard is managed by the berm along the fenced perimeter and the MetalLoxx® wattles installed at the outfall located at the northeast corner of the yard.

The grated drop inlets west of Building 38 are inspected during monthly routine facility inspections and all debris or other obstructions are removed immediately. All onsite and offsite storm drains at the facility connect to a common storm system and common outfall which daylights into a tributary of Sandia Canyon.

Runoff generated from the MFSSSA is minimal. Gravel mulch covers the entire footprint of the site and acts to infiltrate stormwater and minimize runoff. Runoff is managed by the perimeter rock berm located along the southern perimeter of the area.

See the site maps in Figures B-1, B-2 and B-3 and the outfall information provided in Section 1.3 for additional information on the drainage patterns and control measures associated with shops.

#### 3.1.7 Salt Storage Piles or Piles Containing Salt

Salt storage piles or piles containing salt are not stored at this facility.

#### 3.1.8 Dust Generation and Vehicle Tracking of Industrial Materials

The entire outside surface area of the facilities, except for small plots of dirt and grass adjacent to the site on the south boundary, is paved with asphalt and concrete. Other sections of adjacent property on the south side of the facility are stabilized with rock. Dust generation is therefore minimal, and dust suppression is not required. The MFSSA is stabilized with gravel mulch to prevent dust generation and vehicle tracking onto Eniwetok Dr.

Wood cutting and fabrication activities take place inside the CS. Wood shavings are suctioned away from inside equipment (saws and sanders) by duct work connected to the Sternvent Cyclone. Wood shavings are stored in the Sternvent Cyclone compartments until full, then are transferred to the wood shavings roll-off bin located directly under the Sternvent Cyclone. The area around the Sternvent Cyclone is swept monthly or more frequently to ensure that shavings do not mobilize in stormwater runoff. The metal recycling bin and wood shavings bin are transported to the MRF when ~3/4 full. The wood shavings bin is kept covered to keep its contents from coming into contact with stormwater.

#### 3.2 Numeric Effluent Limitations Based on Effluent Limitations Guidelines

The TA-03-38 Shops are classified under **Sector A-Timber Products and Sector AA-Fabricated Metal Products** and do not meet the industrial category requirements for effluent monitoring as listed in Part 2.1.3 (*Table 2-1 Applicable Effluent Limitations Guidelines*) of the 2015 MSGP.

#### 3.3 Water Quality-Based Effluent Limitations and Water Quality Standards

Impaired waters monitoring is performed annually at the facility as listed in Section 4.7 of this SWPPP. The pollutants monitored can change yearly based on the requirements of the MSGP. The table in Section 4.7 lists the current year (2020) monitoring requirements, constituents and regulatory standards. Refer to Section 4.7 for specific actions that are taken when a water quality standard is exceeded.

Stormwater from the TA-03-38 Shops discharges to Sandia Canyon Assessment Unit NM-9000.A\_047 (Sigma Canyon to NPDES outfall 001). Certain stream reaches within Sandia Canyon have been identified as impaired waters by the NMED Surface Water Quality Bureau (SWQB). According to the 2018-2020 State of New Mexico Clean Water Act 303b/305b Integrated Report and Final List of Assessed Surface Waters, pollutants causing the impairment are listed as total recoverable Aluminum, PCBs (Aroclors), and dissolved Copper. EPA has not yet approved or established TMDLs for Sandia Canyon.

#### 4.0 SCHEDULES AND PROCEDURES

Preventative maintenance of control measures used to comply with the Permit effluent limits can avoid situations that result in discharges of pollutants to the environment. Part 5.2.5 of the 2015 MSGP specifies control measures will have a schedules or frequency for maintenance and procedures specifying how maintenance is conducted. Part 5.5 requires documentation of maintenance and repairs including the date(s) of regular maintenance. See Attachment for the Scheduled Maintenance Log.

#### 4.1 Good Housekeeping

See Section 3.1.2 of this SWPPP.

#### 4.2 Maintenance

See Section 3.1.3 of this SWPPP.

#### 4.3 Spill Prevention and Response

See Section 3.1.4 of this SWPPP.

#### 4.4 Erosion and Sediment Control

See Section 3.1.5 of this SWPPP.

#### 4.5 Employee Training

Employee training is essential for effective implementation of the SWPPP and MSGP requirements. The goals for the training program are to ensure that employees: (1) are aware of what happens when pollutants come in contact with stormwater; (2) are familiar with and will implement the requirements of this SWPPP; (3) are capable of preventing spills; (4) respond safely and effectively to an accident when one occurs; (5) recognize when there is an issue with a control measure; (6) recognize when additional control measures are necessary; and (7) identify situations that could lead to stormwater contamination.

Per Part 2.1.2.8 of the 2015 MSGP, training relevant to the SWPPP and MSGP is required for all workers at the facility that work in areas where industrial materials or activities are exposed to stormwater (MSGP sites); workers, managers, and supervisors who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel); and all members of the PPT. Training is designed to ensure these personnel understand the MSGP and SWPPP requirements, as well as their specific responsibilities regarding these requirements.

Training provided and assigned to these personnel cover both the specific control measures used at the facility; along with monitoring, inspection, planning, reporting, and documentation requirements described in this SWPPP. Training will be conducted at least annually. The DEP, Deployed Environment Safety and Health (DESH) Group Leader and Pollution Prevention Team members are responsible for ensuring all appropriate personnel receive this training.

Training activities are documented in accordance with LANL's Training Standards. In cases where training is formalized enough to require specific curricula and reoccurrence, the training activity will be recorded in LANL's official U-TRAIN database. Informal briefings, such as those included in-group safety meetings are not typically recorded in U-TRAIN. Sign-in sheets are used to document attendance and are kept on file in Attachment 11 of this SWPPP.

The topics in this SWPPP that are covered in the latest version of the facility-specific annual MSGP training (see Attachment 11) include the following:

- Overview of the SWPPP contents;
- Spill response and cleanup procedures, good housekeeping, maintenance requirements, and material management practices to prevent stormwater pollution;
- The location of all controls on the site required by this permit and how they are maintained;
- The proper procedures to follow with respect to the permit's pollution prevention requirements; and
- When and how to conduct inspections, record applicable findings, and take corrective actions.

#### 4.6 Routine Facility Inspections and Quarterly Visual Assessments

Routine inspections at this facility are conducted and documented monthly in accordance with EPC-CP-QP-023, MSGP Routine Facility Inspections (Attachment 16).

Visual assessments are conducted in accordance with EPC-CP-QP-064, MSGP Stormwater Visual Assessments (Attachment 18).

#### 4.6.1 Routine Facility Inspections

At least once each calendar year, the routine facility inspection is conducted during a period when a stormwater discharge is occurring. A qualified member of the PPT (typically the DEP, a representative from the EPC-CP Storm Water Permitting/Compliance Team or EPC-CP Program Lead) performs the inspection. The 2015 MSGP consolidates the different and separate documentation requirements in the Comprehensive Site Inspection Procedures and Routine Facility Inspection Procedures from the 2008 MSGP. EPC-CP performs at least one routine facility inspection per year at the facility.

Routine inspections will evaluate the following areas, at a minimum:

- Areas where industrial materials or activities are exposed to stormwater;
- Areas identified in the SWPPP and those that are potential pollutant sources;
- Areas where spills and leaks have occurred in the last three years;
- Discharge points[outfalls/Substantially Identical Outfalls (SIOs)]; and
- Control measures used to comply with the effluent limits contained in this permit.

Specific areas of the facility to be inspected are described in Section 2.1 and 2.2.

During routine inspections, the following are examined:

- Industrial materials, residue or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks and other containers;
- Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site;
- Tracking or blowing of raw, final or waste materials from areas of no exposure to exposed areas;
- Control measures needing maintenance, repairs or replacement.

Inspections performed by the PPT member are documented by completing the routine facility inspection form, which identifies all conditions requiring corrective action and other potential stormwater pollution issues that were encountered. All conditions requiring corrective actions identified during the inspection are addressed in accordance with Section 6.0 *Corrective Actions and Deadlines* of this plan. Facility personnel or the DEP may also perform daily, weekly, or other periodic facility surveys (walk downs) between monthly routine facility inspections to ensure compliance with the SWPPP and MSGP. Completed routine facility inspection forms are provided in Attachment 7 of this SWPPP and meet the requirements listed in the 2015 MSGP (Part 3.1.2.).

#### 4.6.2 Quarterly Visual Assessments

Once each quarter, (April 1-May 31, June 1-July 31, August 1-September 30, October 1-November 30) a stormwater sample is obtained and visual assessment performed at each outfall, if a measureable storm event occurred. A qualified member of the PPT (DEP, EPC-CP field team member or MSGP Program Lead) conducts the visual assessment. The visual assessment will be:

Of a sample in a clean, clear colorless glass or plastic container and examined in a well-lit area;

- On samples collected within the first 30 minutes of an actual discharge from a storm event or as soon as practicable thereafter. Alternatively, document why it was not possible to collect the sample within the first 30 minutes (i.e. adverse conditions, not enough flow, etc.); and
- Conducted at least 72 hours since the last storm event; or document that the 72-hour period is representative of local storm events during the sampling period.

Note: Snowmelt samples need only be collected during a period of measurable discharge.

The visual assessment will assess for the following water quality characteristics: color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of stormwater pollution.

Exceptions to visual assessments:

- Document rationale if a visual assessment is unable to be collected in a quarter (no precipitation event or adverse conditions, etc.); and
- Perform one quarterly assessment during snowmelt discharge (taken during a measurable discharge from the site).

For facilities with SIOs, quarterly visual assessments may be performed at only one of the outfalls, provided that you perform visual inspections on a rotating basis at each substantially identical outfall.

The PPT member performing the visual assessment documents potential stormwater pollution problems that were observed during the assessment on the quarterly visual assessment form. Any condition requiring corrective action identified during the assessment is addressed in accordance with Section 6.0 *Corrective Actions and Deadlines* of this plan. Completed quarterly visual assessments are provided in Attachment 8 of this SWPPP and meet the requirements listed in the 2015 MSGP (Part 3.2.2).

#### 4.7 Monitoring

Stormwater monitoring for impaired waters constituents is performed annually on discharges from the site. Benchmark constituents are monitored quarterly. Monitoring occurs when a storm event results in an actual discharge from the site and follows the preceding measurable storm event by at least 72 hours (3 days), unless documented that the storm event is representative of local storm events during the sampling period. For runoff from snowmelt, the monitoring is performed at a time when a measurable discharge from the site occurs.

Runoff samples are collected by taking a minimum of one grab sample from a discharge, collected within the first 30 minutes of a measurable storm event. If it is not possible to collect the sample within the first 30 minutes of a measurable storm event, the sample is collected as soon as practicable after the first 30 minutes and documentation is kept with the SWPPP explaining why it was not possible. Monitoring samples are analyzed in accordance with test methods identified in 40 CFR Part 136.

LANL is located in a high elevation, semi-arid climate where the majority of rainfall occurs during a period between July and September. Freezing conditions that would prevent runoff from occurring for extended periods may also occur during the winter months. If adverse weather conditions prevent the collection of a sample according to the relevant monitoring schedule, a sample will be collected during the next qualifying storm event or as soon as practicable.

Monitoring (grab sampling) for the CS occurs at monitored outfall **074** as identified in Section 1.5. The monitored outfall is shown on the site map provided in Figure B-1. Outfall 073 is impacted by the same industrial activity areas as Outfall 074 (loading/unloading, covered wood scrape roll-off bin, product chemical storage area and covered Sternvent Cyclone with roll-off bin). Control measures implemented

in the drainage associated with Outfall 073 include an asphalt berm used to divert run-on away from the boundary of industrial activity and a MetalLoxx® wattle used to manage runoff from the covered Sternvent Cyclone with runoff bin. The primary contributor of pollutants to stormwater discharges in the drainage area are spills involving oil, chemicals or products that are unloaded or loaded next to the product/chemical storage area.

Monitoring for the MFS occurs at automated sampling station **MSGP07601** as identified in Section 1.5. The automated sampler and outfall location is shown on the site map provided in Figure B-2. The primary contributor of pollutants to stormwater discharges from outfall 076 is metal storage, chips and turnings, and cutting oil. Two MetalLoxx® wattles are used to manage runoff from the metal storage yard and treat metal residuals. Leaks and spills can occur from the product storage area or vehicles in the area.

Monitoring for the MFSSA occurs at automated sampling station **MSGP07701** as identified in Section 1.5. The outfall location is shown on the site map provided in Figure B-3. The primary contributor of pollutants to stormwater discharges from outfall 077 is metal stored on racks pallets in the satellite storage area. Raw material metal is covered and stored off the ground.

Monitoring will continue annually for constituents associated with impaired waters until a constituent is no longer detected in stormwater samples.

If the impaired water or benchmark constituent value exceeds the New Mexico Water Quality criterion, the Pollution Prevention Team will:

- Review the selection, design, installation, and implementation of control measures to determine if modifications are necessary to meet the effluent limits;
- Implement the necessary modifications within the timeframe specified for corrective action; and
- Continue benchmark or annual monitoring of the constituent (as required by Part 6.2 of the 2015 MSGP);

For each monitoring event, except snowmelt monitoring, the following information is recorded and maintained through work orders, LANL database systems, and Discharge Monitoring Reports:

- The date, exact place, and time of sampling or measurements;
- The date and duration (in hours) of the rainfall event
- Rainfall total (in inches) for that rainfall event
- The individual(s) who performed the sampling or measurements;
- The date(s) analyses were performed
- The individual(s) who performed the analyses;
- The analytical techniques or methods used; and
- The results of such analyses.

All records of monitoring information, including all calibration and maintenance records are maintained for a minimum period of at least three years from the date the permit expires.

LANL's applicable stormwater monitoring procedures can be found in the following Attachments:

- EPC-CP-QP-047, Inspecting Stormwater Runoff Samplers and Retrieving Samples for the MSGP (Attachment 19); and
- EPC-CP-QP-2106, Processing MSGP Stormwater Samples (Attachment 20).

The table on the following page lists the current Summary of Monitoring Requirements. The monitoring values have been modified to reflect New Mexico water quality standards and are based on the most

protective water quality standards from the Standards for Interstate and Intrastate Surface Waters (effective on February 28, 2018), 20.6.4.900 NMAC; and as set forth in Part 9.6.2.1 of the 2015 MSGP.

# **Summary of Monitoring Requirements**

# Required Monitoring for CY2020, Carpentry Shop Outfall 074

Monitored Outfall	Monitoring Requirement	Industrial Sector	Assessment Unit	Analyte	Filtered/ Unfiltered	Regulatory Standard	Units	Regulatory Standard Type	Regulatory Standard Reference
074	Impaired Waters	-	NM-9000.A_047	Al	F10u <sup>1</sup>	1010	ug/L	NM 2010 Aquatic Chronic 80 mg	20.6.4.900 NMAC Subpart I
	Impaired Waters	-	NM-9000.A_047	Cu	F <sup>2</sup>	7	ug/L	NM 2010 Aquatic Chronic 80 mg	20.6.4.900 NMAC Subpart I

<sup>&</sup>lt;sup>1</sup>F10u – 10 μm filter

# **Metal Fabrication Shop – Outfall 076**

Due to physical site changes, outfall 002 was replaced by outfall 076 on May 1, 2019, therefore monitoring at outfall 002 is discontinued.

Monitored Outfall	Monitoring Requirement	Industrial Sector	Assessment Unit	Analyte	Filtered/ Unfiltered	Regulatory Standard	Units	Regulatory Standard Type	Regulatory Standard Reference
076	Impaired Waters/ Quarterly Benchmark	AA	NM-9000.A_047	Al	F10u <sup>1</sup>	1010	ug/L	NM 2010 Aquatic Chronic 80 mg	20.6.4.900 NMAC Subpart I
	Impaired Waters	ı	NM-9000.A_047	Cu	F <sup>2</sup>	7	ug/L	NM 2010 Aquatic Chronic 80 mg	20.6.4.900 NMAC Subpart I
	Quarterly Benchmark	AA	-	Fe	UF	1000	ug/L	MSGP QBM 2015	NMR050013 Sect 9.6.2.1
	Quarterly Benchmark	AA	-	NO3+NO2-N	UF	0.68	mg/L	MSGP QBM 2015	NMR050013 Sect 9.6.2.1
	Quarterly Benchmark	AA	-	Zn	F	99	ug/L	NM 2010 Aquatic Chronic 80 mg	20.6.4.900 NMAC Subpart I

<sup>&</sup>lt;sup>1</sup>F10u – 10 μm filter

<sup>&</sup>lt;sup>2</sup>F - 0.45 μm filter

 $<sup>^2\</sup>text{F}$  - 0.45  $\mu\text{m}$  filter

# MFSSSA - Outfall 077

Due to the addition of a new raw material storage area for the PFS, monitoring for outfall 077 will start in April, 2020.

Monitored Outfall	Monitoring Requirement	Industrial Sector	Assessment Unit	Analyte	Filtered/ Unfiltered	Regulatory Standard	Units	Regulatory Standard Type	Regulatory Standard Reference
077	Impaired Waters/ Quarterly Benchmark	AA	NM-9000.A_047	Al	F10u <sup>1</sup>	1010	ug/L	NM 2010 Aquatic Chronic 80 mg	20.6.4.900 NMAC Subpart I
	Impaired Waters	-	NM-9000.A_047	Cu	F <sup>2</sup>	7	ug/L	NM 2010 Aquatic Chronic 80 mg	20.6.4.900 NMAC Subpart I
	Impaired Waters	-	NM-9000.A_047	Total Aroclor	UF	0.2	ug/L	2007 EPA R6 MQL	20.6.4.900 NMAC Subpart J/ 20.6.4.12 NMAC Subpart E
	Quarterly Benchmark	AA	=	Fe	UF	1000	ug/L	MSGP QBM 2015	NMR050013 Sect 9.6.2.1
	Quarterly Benchmark	AA	-	NO3+NO2-N	UF	0.68	mg/L	MSGP QBM 2015	NMR050013 Sect 9.6.2.1
	Quarterly Benchmark	AA	-	Zn	F	99	ug/L	NM 2010 Aquatic Chronic 80 mg	20.6.4.900 NMAC Subpart I

<sup>&</sup>lt;sup>1</sup>F10u – 10 μm filter

<sup>&</sup>lt;sup>2</sup>F - 0.45 μm filter

#### 5.0 DOCUMENTATION FOR ELIGIBILITY CONSIDERATIONS UNDER OTHER FEDERAL LAWS

#### 5.1 Endangered Species

The Final Site-Wide Environmental Impact Statement (EIS) for the Operation of Los Alamos National Laboratory (DOE/EIS-0380) was issued in May 2008, and a Record of Decision in September 2008. Stormwater issues and associated pollution prevention requirements and activities at LANL are analyzed in Chapters 4 and 5 of the 2008 Site-Wide EIS. These activities are integrated into environmental reviews on a project-specific level through LANL's Integrated Review Tool (IRT), which incorporates both the Excavation Permit (EX-ID) and Permit Requirements Identification (PR-ID) process. Stormwater issues are identified and pollution prevention activities are implemented during the design and construction phases of all LANL projects, and as part of facility operations, including routine maintenance. LANL staff monitors stormwater pollution prevention compliance at MSGP sites in accordance with Section 4.7 *Monitoring* of this plan. Corrective actions are taken as necessary as described in Section 6.0 *Corrective Actions and Deadlines* of this plan.

Part 5.2.2 of the 2015 MSGP requires areas of designated critical habitat for endangered or threatened species, as applicable, be included in the SWPPP. The *Threatened and Endangered Species Habitat Management Plan for Los Alamos National Laboratory* (LA-UR-17-29454) was last updated in October 2017 (see Attachment 13). This document provides a management strategy for the protection of threatened and endangered species and their habitats on LANL property. The MSGP IPaC Trust Resource Report (see Attachment 14) is also attached for informational purposes.

#### **5.2** Historic Properties

In August, 2015 and December 2008, the Cultural Resources Team (using GPS spatial data as well as conducting visual inspections), reviewed the Laboratory industrial sites (see list below) and their associated outfalls and monitoring stations subject to the 2015 Multi-Sector General Permit (Permit #NMR050000) for effects on historic properties. All of these sites were found to be undertakings of no effect and in compliance with Section 106 of the National Historic Preservation Act (i.e., Criterion B).

- TA-03-22 Power and Steam Plant
- TA-03-38 Metals Fabrication Shop
- TA-03-38 Wood Shop
- TA-03-39 and 102 Metal Shop
- TA-03-66 Sigma Complex
- TA-60 Asphalt Batch Plant
- TA-60-1 Heavy Equipment Yard
- TA-60 Material Recycle Facility
- TA-60 Roads and Grounds
- TA-60-2 Warehouse
- TA-54 RANT

#### 6.0 CORRECTIVE ACTIONS AND DEADLINES

When any of the following conditions occur or are detected during an inspection, monitoring or any other means, this SWPPP (e.g., sources of pollution; spill and leak procedures; non-stormwater discharges; the selection, design, installation and implementation of control measures) is reviewed and revised (as appropriate). The purpose is to ensure effluent limits of the 2015 MSGP permit are met and pollutant discharges are minimized:

- An unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by this or another NPDES permit to a water of the U.S.) occurs at the facility;
- A discharge violates a numeric effluent limit;
- Control measures are not stringent enough for the discharge to meet applicable water quality standards or non-numeric effluent limits;
- An inspection identifies that a required control measure was never installed, was installed incorrectly or is not being properly operated or maintained; and
- Whenever a visual assessment shows evidence of stormwater pollution.

When any of the following conditions occur, a review of the selection, design, installation, and implementation of control measures is performed to determine if modifications are necessary to meet the effluent limits in this permit:

- Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged; or
- The average of 4 quarterly sampling results exceeds an applicable benchmark. If less than 4 benchmark samples have been taken, but the results are such that an exceedance of the 4 quarter average is mathematically certain (i.e., if the sum of quarterly sample results to date is more than 4 times the benchmark level) this is considered a benchmark exceedance, triggering this review (see Section 4.7); or
- If an impaired water constituent exceeds the New Mexico Water Quality criterion (see Section 4.7).

When the review identifies the need to modify the SWPPP, it will be revised within 14 calendar days of completion of the associated condition requiring corrective action.

#### 6.1 Immediate Actions

When a condition requiring corrective action is identified, all reasonable steps necessary to minimize or prevent the discharge of pollutants are immediately taken (i.e. spill clean-up, scheduling repairs) until a permanent solution (if needed) can be implemented. Immediate action means all reasonable steps are taken the same workday or no later than the following workday (when it is too late in the day to take corrective action).

#### **6.2** Subsequent Actions

When additional corrective actions are required (e.g. installing or making operational a new or modified control, completing repairs, ordering BMPs) they will be completed by the next storm event, if possible, or within 14 calendar days (from initial discovery). When it is determined that it is infeasible to complete corrective actions within 14 days, documentation of infeasibility and a schedule for completion of the work is documented in the CAR database, which will be completed no later than 45 days (from initial

discovery). When it is determined that corrective actions will exceed 45 days, EPA is notified and provided justification of why actions will exceed the timeframe; and a minimal amount of additional time to complete the work may be approved.

#### 6.3 Corrective Action Documentation

Upon discovery, conditions requiring corrective action are documented by the DEP or EPC-CP on a Routine Facility Inspection Form and/or entered into the CAR database. The action will be kept open in the database until the issue has been resolved. Documentation of maintenance and repairs of stormwater control measures will be kept in Attachment 10 of this SWPPP. Where corrective actions result in changes to procedures or controls documented in this SWPPP, modifications to the SWPPP are made accordingly within 14 calendar days of completing the corrective action(s). LANL procedure EPC-CP-QP-022, MSGP Corrective Actions can be found in Attachment 17.

#### 7.0 ACRONYMS

ВМР	Best Management Practice
CAR	Corrective Action Report
CS	Carpentry Shop
DEP	Deployed Environmental Professional
DESH	Deployed Environmental Safety and Health
DOE	Department of Energy
EIS	Environmental Impact Statement
ELG	Effluent Limitation Guidelines
EMD-ER	Emergency Management Division-Emergency Response
EPA	Environmental Protection Agency
EPC-CP	Environmental Protection and Compliance – Compliance Programs
FOD	Facility Operations Division
HAZMAT	Hazardous Materials (Response Group)
IPaC	Information for Planning and Consultation
LANL or the Laboratory	Los Alamos National Laboratory
LANS	Los Alamos National Security
LOG-CS	Logistics-Central Shops
MFSSSA	Metals Fabrication Shop Satellite Storage Area
MFS	Metal Fabrication Shop
MRF	Material Recycling Facility
MSGP or Permit	Multi-Sector General Permit
NMED	New Mexico Environment Department
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
PFS	Pipe Fitter's Shop

#### TA-03-38 Carpentry and Metal Fabrication Shops

MSGP Stormwater Pollution Prevention Plan Revision 1, January 2020

PPT	Pollution Prevention Team
TPH	Total Petroleum Hydrocarbons
SWMU	Solid Waste Management Unit
SWPPP	Stormwater Pollution Prevention Plan
URL	Uniform Resource Locator
UI	Utilities and Institutional Facilities
UIS	Utilities & Infrastructure Support

Date\_ 1/30/2020

#### 8.0 SWPPP CERTIFICATION

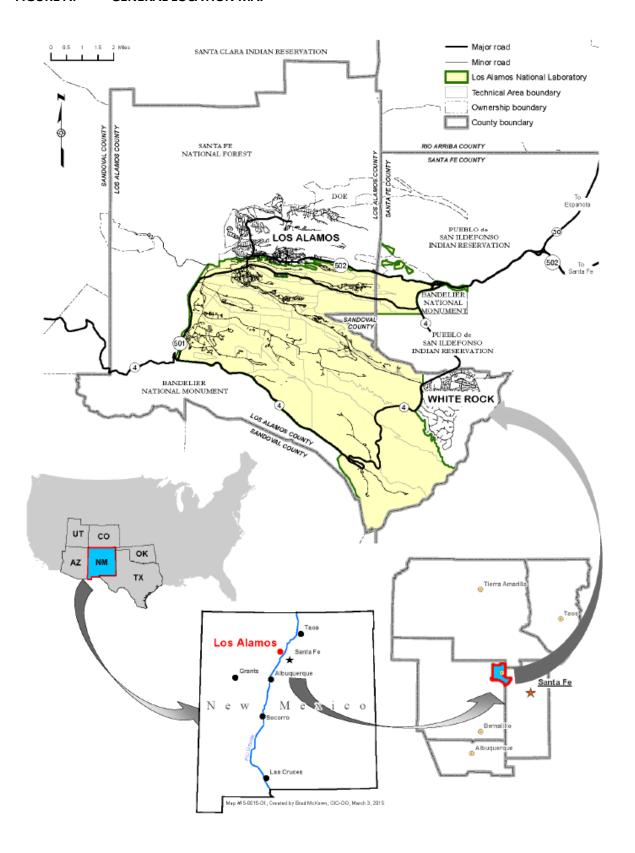
# STORMWATER POLLUTION PREVENTION PLAN TA-03-38 Carpentry and Metal Fabrication Shops Los Alamos National Laboratory

#### **CERTIFICATION STATEMENT**

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

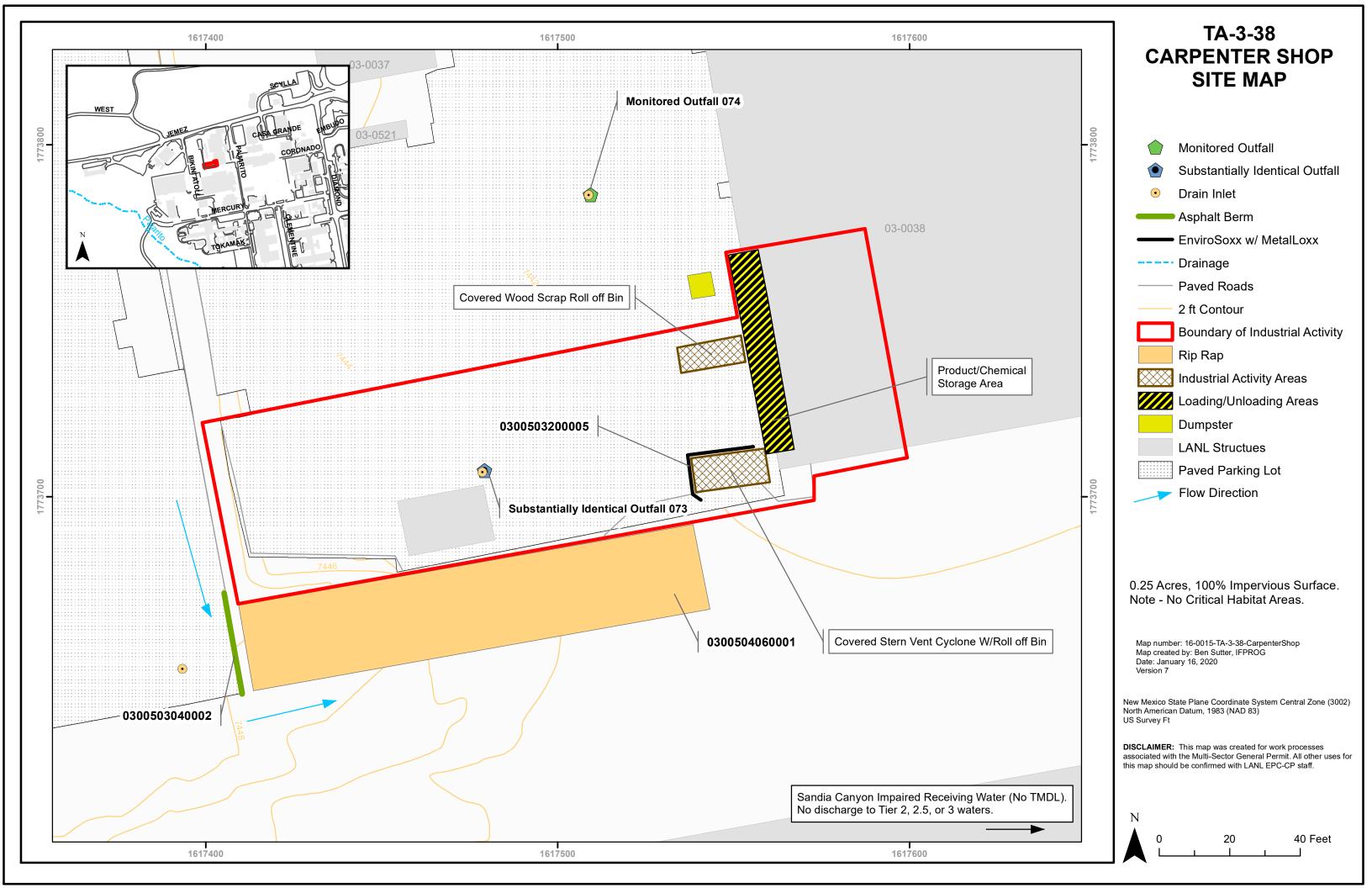
Andrew W. Erickson
Facility Operations Director
Utilities and Institutional Facilities

FIGURE A: GENERAL LOCATION MAP

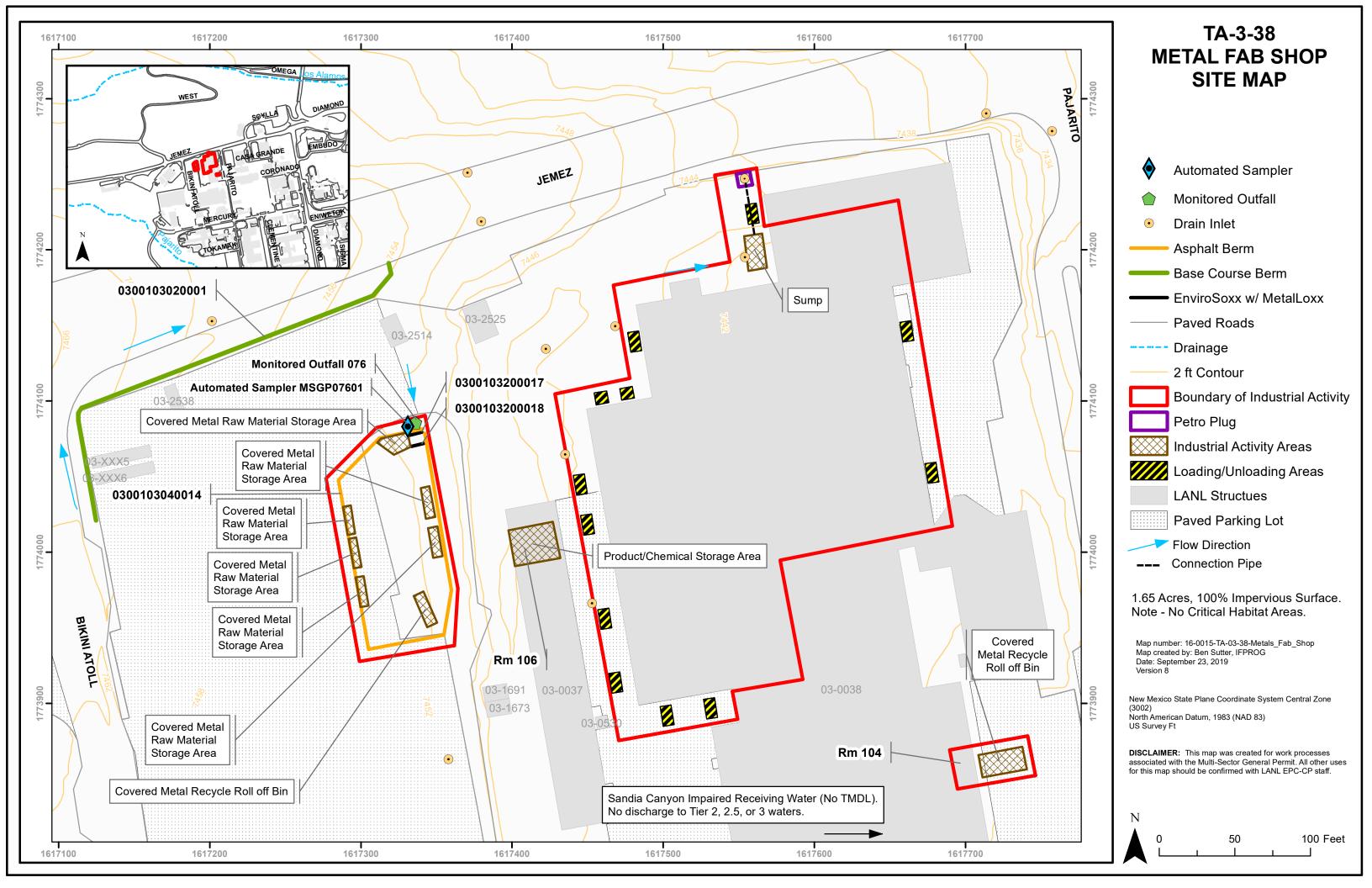


Map(s)

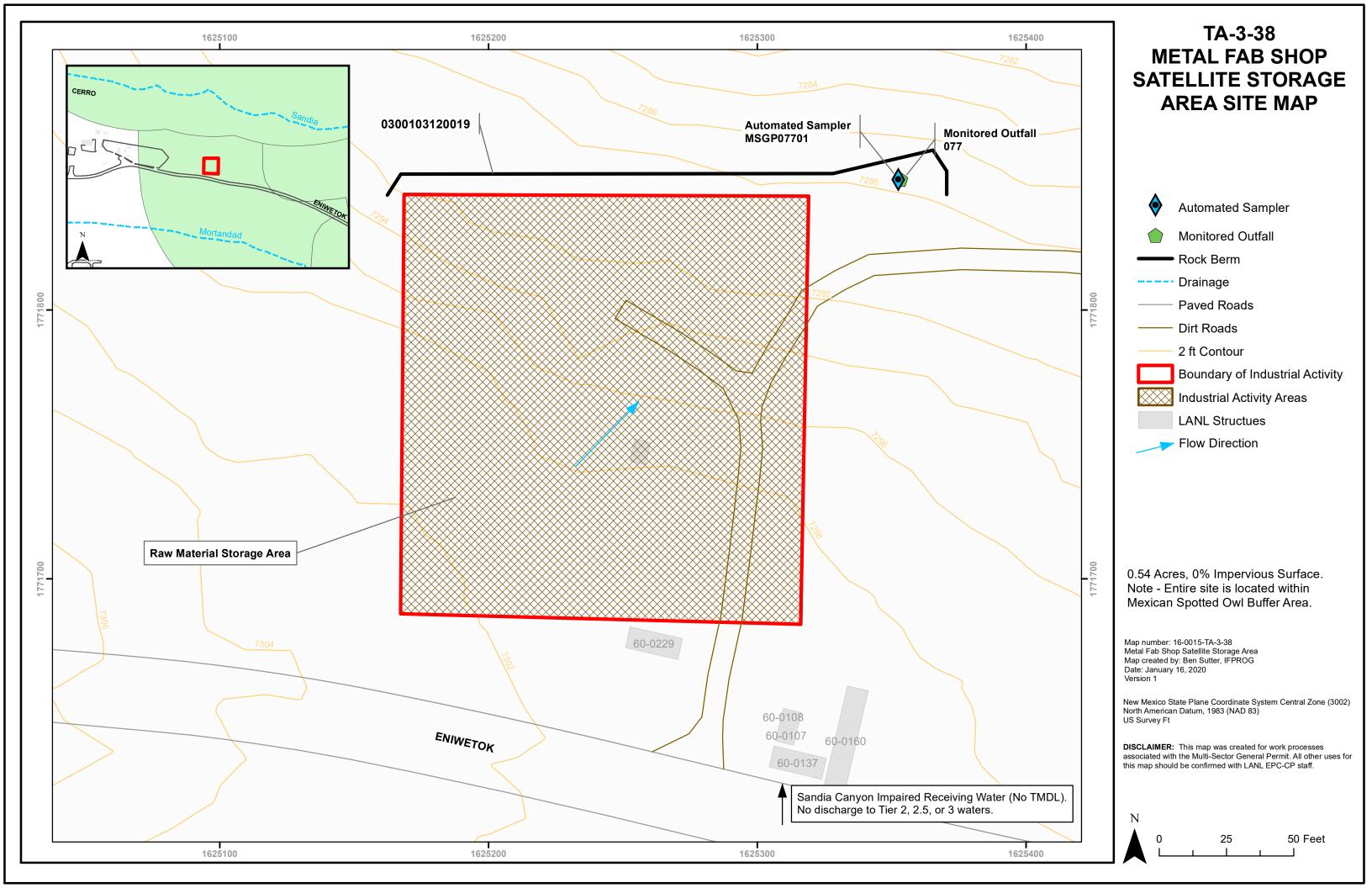
#### FIGURE B-1 FACILITY SITE MAP CARPENTRY SHOP



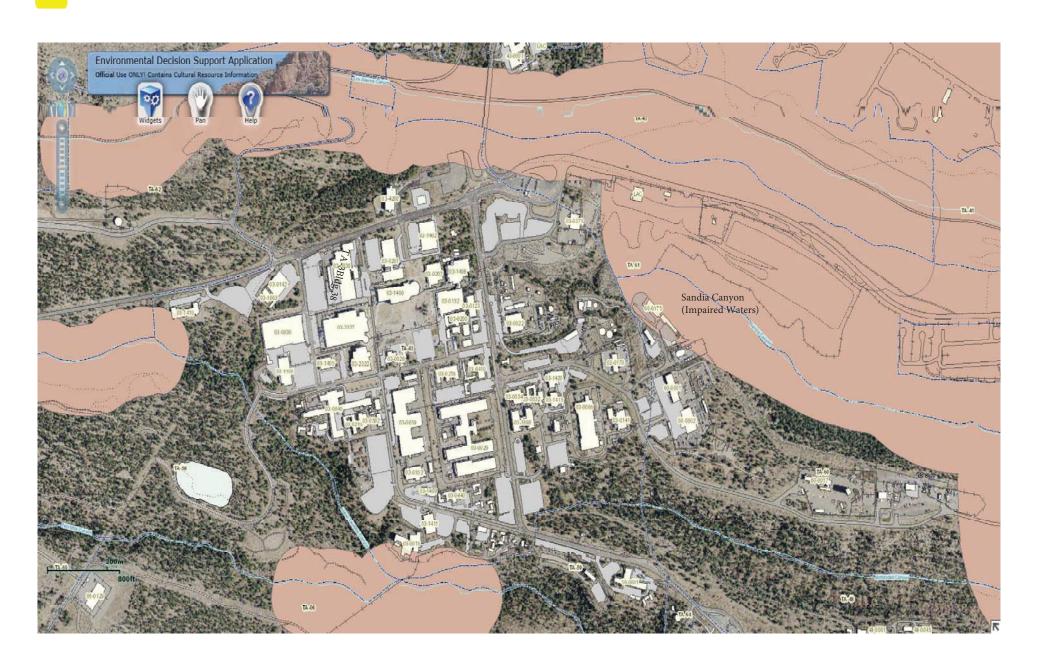
#### FIGURE B-2 FACILITY SITE MAP METALS FABRICATION AND PIPE FITTER'S SHOPS



#### FIGIRE B-3 METALS FABRICATION SHOP SATELLITE STORAGE AREA

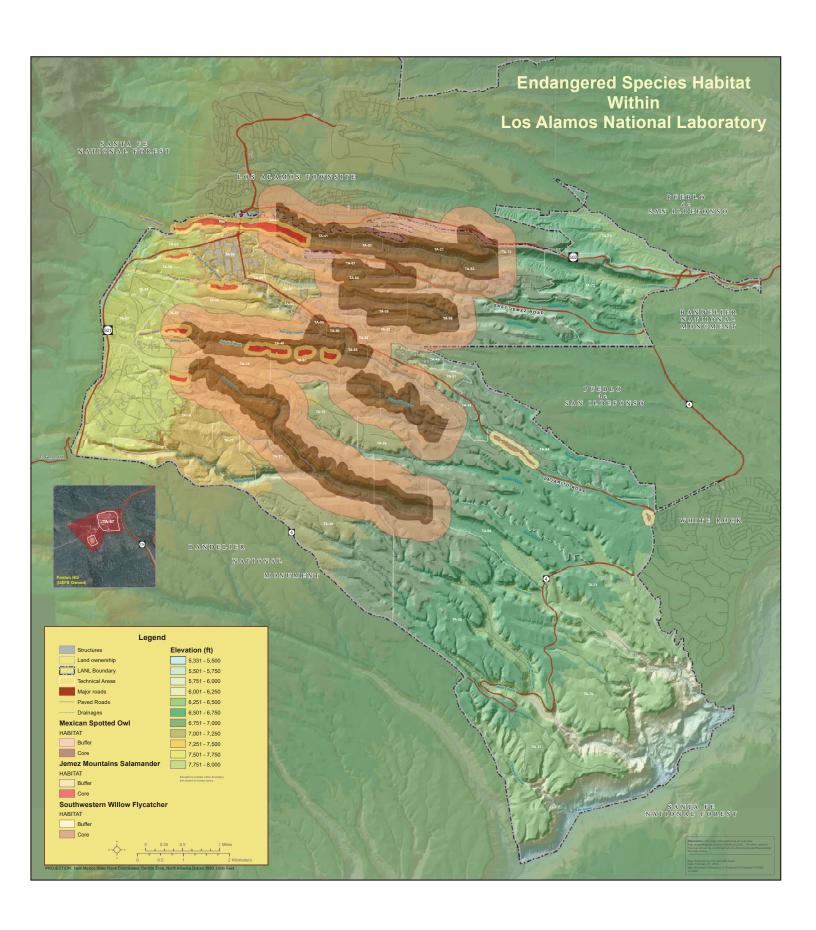


#### FIGURE B-4 NEARBY RECEIVING WATERS



 $http://gis-arcserver-p/DSA\_Rev3/default.aspx$ 

#### FIGURE B-5 ENDANGERED SPECIES MAP



ATTACHMENT 1: NOTICE OF INTENT, SUPPORTING DOCUMENTATION, AND UPDATES



# U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) EPA'S NPDES EREPORTING HELP DESK



10/26/2018

Triad National Security LLC ATTN: Michael W. Hazen PO Box 1663 MS K490 Los Alamos, NM 87545 Facility: Los Alamos National Laboratory PO Box 1663

Los Alamos, NM 87545

NPDES ID: NMR050013

Dear Michael W. Hazen:

This letter acknowledges that you have submitted a complete Notice of Intent form to be covered under the NPDES Multi-Sector General Permit (MSGP) for stormwater discharges associated with industrial activity. Coverage under this permit begins at the conclusion of your 30-day waiting period, on 11/01/2018, unless EPA notifies you that your authorization has been denied or delayed.

For tracking purposes, the following NPDES ID has been assigned to your Notice of Intent: NMR050013

As stated above, this letter acknowledges receipt of a complete Notice of Intent. However, it is not an EPA determination of the validity of the information you provided. Your eligibility for coverage under the Permit is based on the validity of the certification you provided. Your signature on the Notice of Intent certifies that you have read, understood, and are implementing all of the applicable requirements. An important aspect of this certification requires that you correctly determine whether you are eligible for coverage under this permit.

As you know, the MSGP requires you to have developed a Stormwater Pollution Prevention Plan (SWPPP) prior to submitting your NOI. The MSGP also includes specific requirements for implementing control measures (e.g., minimize exposure, good housekeeping, maintenance, spill prevention and response), conducting self-inspections and visual assessments of your discharges, taking corrective actions, and conducting staff training. You must comply with any specific requirements applicable to your industrial sector(s) in Part 8 and any state/tribal-specific requirements in Part 9 (see <a href="https://www.epa.gov/npdes/stormwater-discharges-industrial-activities">https://www.epa.gov/npdes/stormwater-discharges-industrial-activities</a>). You are also required to submit an Annual Report in accordance with Part 7.5 of the MSGP that will contain the results from your past year's routine facility inspections, quarterly visual assessments, and corrective actions.

The MSGP includes five types of required analytical monitoring, one or more of which may apply to your discharge:

- Quarterly benchmark monitoring (see Part 6.2.1 and Part 8);
- Annual effluent limitations guidelines monitoring (see Part 6.2.2 and Part 8);
- State- or tribal-specific monitoring (see Part 6.2.3 and Part 9);
- Impaired waters monitoring (see Part 6.2.4); and

• Other monitoring as required by EPA (see Part 6.2.5).

Monitoring requirements in the MSGP (i.e., parameters required to be monitored and sample frequency) will be prepopulated on your electronic Discharge Monitoring Report (DMR) in EPA's NetDMR system, which is accessed at <a href="https://netdmr.epa.gov">https://netdmr.epa.gov</a>. Where you have determined that no monitoring requirements apply to your discharge, there is no need to access the NetDMR system. In order to obtain access to this system, you must complete the electronic signature process. Please refer to the following guidance for information about submitting monitoring reports through NetDMR:

 $\underline{https://www.epa.gov/npdes/stormwater-discharges-industrial-activities\#ereporting.}$ 

If you have general questions regarding the stormwater program or your responsibilities under the Multi-Sector General Permit, please contact:

EPA Region 06 Name: Nasim Jahan Phone: (214) 665-7522

Email: jahan.nasim@epa.gov

If you have questions about your Notice of Intent form, please call the EPA NPDES eReporting Help Desk at 1-877-227-8965 (toll free) or send an email to <a href="mailto:NPDESeReporting@epa.gov">NPDESeReporting@epa.gov</a>.

EPA NPDES eReporting Help Desk Operated by Avanti Corporation 1200 Pennsylvania Ave., NW Mail Code: 4203M Washington, DC 20460 1-877-227-8965



Date:

OCT 0 1 2018

Symbol:

EPC-DO: 18-358

LA-UR:

18-29182

Locates Action No.: N/A

Stormwater Notice Processing Center William Jefferson Clinton East Building – Room 7420 ATTN: 2015 MSGP Signature Agreement U.S. Environmental Protection Agency 1201 Constitution Avenue, NW Washington, DC 20004

Subject: National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit (MSGP) Notice of Intent (NOI) Reporting Pursuant to Part B.12.C

To Whom It May Concern:

This letter serves to document the transmittal of a NOI for Stormwater Discharges Associated with Industrial Activity under the NPDES MSGP for Triad National Security, LLC (Triad) as a new operator for Los Alamos National Laboratory (LANL) pursuant to Part B.12.C of the 2015 MSGP. Triad is replacing Los Alamos National Security, LLC (LANS) as operator of LANL effective November 1, 2018.

EPA's Electronic Reporting Rule requires that NOIs be submitted using the NeT-MSGP program service on the EPA Central Data Exchange system. However, due to the following system limitations previously identified by LANS and coordinated with EPA Region 6 personnel, a complete and accurate NOI cannot be submitted using NeT-MSGP.

- 1. Part 9.6.2 of the 2015 MSGP, Permit Conditions for the State of New Mexico, requires that benchmark values be modified to reflect New Mexico water quality standards for facilities in New Mexico, based on benchmark values from the Standards for Interstate and Intrastate Surface Waters (20.6.4.900 New Mexico Administrative Code [NMAC]). These modified benchmark values are not recognized by NeT-MSGP and populated in NetDMR.
- 2. The 2018-2020 State of New Mexico Clean Water Act §303(d)/§305(b) Integrated Report requires monitoring of impaired waters pollutants not available for selection in NeT-MSGP (e.g., Adjusted Gross Alpha and Total Recoverable Aluminum).
- 3. 20.6.4.900 NMAC requires monitoring of certain modified benchmark and impaired waters metals pollutants as dissolved species, which are not available for selection in NeT-MSGP. Currently, only total metals species may be assigned in NeT-MSGP.
- 4. Due to extended frozen conditions during the winter and a semi-arid climate, Triad will implement an alternative monitoring period of four (4) two-month monitoring quarters for benchmark values as identified below, in accordance with Part 6.1.6 of the 2015 MSGP. This alternate monitoring schedule

does not coincide with the default four (4) three-month quarters listed in Part 6.1.7 of the 2015 MSGP and NeT-MSGP does not allow input of an alternate monitoring schedule. Accordingly, annual impaired waters and Effluent Limitation Guideline monitoring will be conducted between April 1 and November 30 of each year.

April 1 through May 31 June 1 through July 31 August 1 through September 30 October 1 through November 30

These system limitations directly result in inaccurate pollutants, limits, monitoring periods and DMR due dates being populated in NetDMR.

Additionally, Part 6.1.7 of the 2015 MSGP states that monitoring requirements in the permit begin in the first full quarter following the date of discharge authorization. Per the alternative monitoring schedule above, Triad interprets monitoring requirements to begin April 1, 2019.

EPA Region 6 has recognized the challenges that the outgoing operator (LANS) has identified with NeT-MSGP related to compliance with Part 9.6.2 of the 2015 MSGP, Permit Conditions for the State of New Mexico, and has been instrumental in helping LANS to resolve these issues. Thus, Triad was granted a waiver to submit a paper NOI from Nasim Jahan (EPA Region 6) on 9/26/2018 (Enclosure 1). To facilitate complete and accurate information in Net-MSGP and NetDMR, Triad is submitting a paper NOI on EPA Form 3510-6 (Enclosure 2), and an additional table defining monitored outfall-specific Sector and impaired waters limit sets, monitoring periods and DMR due dates (Enclosure 3) for population in the NetDMR system. EPA previously implemented similar monitoring requirements for LANL's 2015 MSGP coverage as operated by LANS under NPDES ID NMR053195.

Your assistance is greatly appreciated as Triad is committed to maintaining compliance with the MSGP requirements. If you have any questions, please contact Terrill Lemke (505) 665-2397 or Leslie Dale (505) 606-2371.

Sincerely,

Michael W. Hazen

Associate Laboratory Director Triad National Security, LLC

MWH:TWL:LJD:jdm

Enclosure(s):

- 1) EPA Region 6 Approval for Triad National Security, LLC to Submit a Paper NOI
- 2) NOI for Stormwater Discharges Associated with Industrial Activity under the NPDES Multi-Sector General Permit

- 3) NetDMR Monitoring Requirements for Los Alamos National Laboratory, Operated by Triad National Security, LLC
- 4) Threatened and Endangered Species Protection Concurrence Letters from the United States Department of Interior, Fish and Wildlife Service

Copy: Nasim Jahan, EPA Region 6, (E-File), Helen Nguyen, EPA Region 6, (E-File), Sarah Holcomb, NMED/SWQB, (E-File), Karen E. Armijo, NA-LA, (E-File), Thomas E. Mason, Triad, (E-File), Kelly Beierschmitt, Triad, (E-File), Kevin T. Amery, Triad, (E-File), J. Barton Lounsbury, Triad, (E-File), G. Drew Fuller, Triad, (E-File), Timothy A. Dolan, LC-ESH, (E-File), William R. Mairson, ADESH, (E-File), Enrique Torres, EPC-DO, (E-File), Taunia S. Van Valkenburg, EPC-CP, (E-File), Terrill W. Lemke, EPC-CP (E-File), Holly L. Wheeler, EPC-CP (E-File), Leslie J. Dale, EPC-CP (E-File), locatestream@lanl.gov (E-File), adesh-records@lanl.gov (E-File), epc-correspondence@lanl.gov (E-File)

TRIAD National Security, LLC 3

# **ENCLOSURE 1**

EPA Region 6 Approval for Triad National Security, LLC to Submit a Paper NOI

EPC-DO: 18-358

LA-UR-18-29182

Date:\_\_\_\_\_

#### Dale, Leslie J

From:

Lemke, Terrill W

Sent:

Wednesday, September 26, 2018 4:16 PM

To:

Dolan, Timothy Aloysius; Dale, Leslie J; Wheeler, Holly Lynn

Subject:

FW: Request for LANL Paper MSGP NOI Waiver

Follow Up Flag:

Follow up Flagged

Flag Status:

FYI

Terrill Lemke, PE, CPESC, CISEC Environmental Compliance Programs Los Alamos National Laboratory Los Alamos, NM

Office: 505-665-2397 Cell: 505-699-0725

From: Jahan, Nasim < Jahan. Nasim@epa.gov>
Sent: Wednesday, September 26, 2018 2:43 PM

To: Lemke, Terrill W <tlemke@lanl.gov>

Cc: Emily Gorman <emily@avanticorporation.com>
Subject: RE: Request for LANL Paper MSGP NOI Waiver

Dear Mr. Terrill:

EPA, Region 6 is approving your request for paper submission as the facility is unable to submit the NOI online.. Please mail the hardcopies to the following address:

#### For Regular U.S. Mail Delivery:

Stormwater Notice Processing Center
Mail Code 4203M, ATTN: 2015 MSGP Signature Agreement
U.S. EPA
1200 Pennsylvania Avenue, NW
Washington, DC 20460

#### For Overnight/Express U.S. Mail Delivery:

Stormwater Notice Processing Center
William Jefferson Clinton East Building – Room 7420
ATTN: 2015 MSGP Signature Agreement
U.S. EPA
1201 Constitution Avenue, NW
Washington, DC 20004

Thank you,

Nasim Jahan

EPC-DO: 18-358

1

LA-UR-18-29182

#### October 1 through November 30

These system limitations directly result in inaccurate pollutants, limits, monitoring periods and DMR due dates being populated in NetDMR.

EPA Region 6 has recognized the challenges that the outgoing operator (LANS) has identified with NeT-MSGP related to compliance with Part 9.6.2 of the 2015 MSGP, Permit Conditions for the State of New Mexico, and has been instrumental in helping LANS to resolve these issues. Therefore, per your verbal direction, we are requesting a waiver for Triad to submit a paper NOI in lieu of submitting an inaccurate and incomplete NOI in NeT-MSGP. Please advise at your earliest convenience if you concur with our submittal of a paper NOI, as we must submit by Oct 2.

We appreciate your assistance in helping us maintain compliance. If you have any questions, please contact me at (505) 665-2397.

Terrill

Terrill Lemke, PE, CPESC, CISEC Environmental Compliance Programs Los Alamos National Laboratory Los Alamos, NM

Office: 505-665-2397 Cell: 505-699-0725

> 3 EPC-DO: 18-358 LA-UR-18-29182

# **ENCLOSURE 2**

NOI for Stormwater Discharges Associated with Industrial Activity under the NPDES Multi-Sector General Permit

EPC-DO: 18-358

LA-UR-18-29182

Date:	OCT 0 1 2018	

NPDES FORM 3510-6



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

NOTICE OF INTENT (NOI) FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMIT

Form Approved. OMB No. 2040-0004

Submission of this Notice of Intent (NOI) constitutes notice that the operator identified in Section C of this form requests authorization to discharge pursuant to the NPDES Stormwater Multi-Sector General Permit (MSGP) permit number identified in Section B of this form. Submission of this NOI also constitutes notice that the operator identified in Section C of this form meets the eligibility conditions of Part 1.1 of the MSGP for the facility identified in Section D of this form. To obtain authorization, you must submit a complete and accurate NOI form. Discharges are not authorized if your NOI is incomplete or inaccurate or if you were never eligible for permit coverage. Refer to the instructions at the end of this form to complete your NOI.

never eligible for permit coverage. Refer to the instructions at the end of this form to complete your NOI.						
A. Approval to Us	e Paper NOI Form					
1. Have you been g	ranted a waiver from electronic reporting from the EPA Regional Office*? 🔳 YES 🔲 NO					
If yes, check wh	ich waiver you have been granted, the name of the EPA Regional Office staff person who granted the waiver, and the date of approval:					
Waiver grante	The owner/operator's headquarters is physically located in a geographic area (i.e., ZIP code or census tract) that is identified as under-served for broadband Internet access in the most recent report from the Federal Communications Commission.					
	The owner/operator has issues regarding available computer access or computer capability.					
Name of EPA	staff person that granted the waiver: Nasim Jahan					
Date approve	al obtained: 0 9 / 2 6 / 2 0 1 8					
must file this form	uired to obtain approval from the applicable EPA Regional Office prior to using this paper NOI form. If you have not obtained a waiver, you electronically using the NPDES eReporting Tool (NeT) at <a href="http://water.epa.gov/polwaste/npdes/stormwater/Stormwater-eNOI-System-for-General-Permit.ctm">http://water.epa.gov/polwaste/npdes/stormwater/Stormwater-eNOI-System-for-General-Permit.ctm</a>					
B. Permit Informat	ion NPDES ID (EPA Use Only):					
1. Master Permit Nun	nber: NMR050000 (see Appendix C of the MSGP for the list of eligible master permit numbers)					
2. Are you a new dis	charger or a new source as defined in Appendix A? 🗌 YES 🔝 NO (If yes, skip to Part C of this form).					
	ew discharger or a new source, have stormwater discharges from your facility been covered previously under an NPDES permit?					
■ YES □ NO						
If yes, provide t permit: <b>Note: F</b>	he NPDES ID if you had coverage under EPA's 2008 MSGP or the NPDES ID if you had coverage under an EPA individual to SG B 2 1  acility had 2015 MSGP coverage under Permit ID NMR053195 with Los Alamos National Security, LLC as operator.					
C. Facility Operate	or Information					
1. Operator Informat						
Operator Name:	Triad National Security LLC					
Mailing Address:						
Street:	PO BOX 1663 MS K490					
City:	Los Allamos State: NM ZIP Code: 87545-					
County or Similar Go	vernment Subdivision: Los Alamos					
Phone:	5 0 5 - 6 6 5 - 2 3 9 7 Ext.					
E-mail:	t      e m    k  e @     a n					
2. Operator Point of (	Contact Information:					
First Name, Middle Ini	itial, Last Name:   Terrill					
litle:	Environmental Manager					
NOI Preparer Information (Complete if NOI was prepared by someone other than the certifier):						
First Name, Middle Ini	tial, Last Name: Holly L Wheeler					
Organization:	Triad National Security LLC					
hone:	5 0 5 - 6 6 7 - 1 3 1 2 Ext.					
E-mail;	h b e n s o n @  a n  .  g o v					

D. Facility Information				
1. Facility Name: Los Allamos National Laboratory				
2. Facility Address:				
Street/Location: PO Box 1663				
City: Los Alamos State: NM ZIP Code: 875	5 4 5 -			
County or Similar Government Subdivision:				
3. Latitude/Longitude for the facility:				
Latitude: 3 5 8 7 2 8 ° N (decimal degrees) Longitude: 1 0 6 3 2 1 1 ° W (decimal degrees)				
Latitude/Longitude Data Source: Map GPS Other				
If you used a USGS topographic map, what was the scale?				
Horizontal Reference Datum: NAD 27 NAD 83				
4. Is your facility located on Indian Country lands? 🔲 YES 🔳 NO				
If yes, provide the name of the Indian tribe associated with the area of Indian country (including name of Indian reservation, if app	plicable):			
5. Are you requesting coverage under this NOI as a "federal operator" as defined in Appendix A? YES NO  6. What is the ownership type of the				
facility?  Federal Facility (U.S. Government) Privately Owned Facility Municipality	☐ County Government			
☐ Corporation ☐ State Government ☐ Tribal Government ☐ School District				
□ District □ Mixed Ownership (e,g, □ Municipal or Water Public/Private) □ District				
7. Estimated area of industrial activity at your facility exposed to stormwater: $\frac{60.50}{}$ (to the nearest quarter acre)				
8, Sector-Specific Information NOTE: Sectors do not apply to every outfall. Refer to Section E.3 for Outfall-specific Sector associations.				
Identify the 4-digit Standard Industrial Classification (SIC) code or 2-letter Activity Code that best represents the products produced or se which your facility is primarily engaged, as defined in the MSGP, and the applicable sector and subsector of your primary industrial activ	ervices rendered for			
Primary SIC Code: 4212 OR Primary Activity Code:				
Sector: P Subsector: P 1				
Identify the applicable sector(s) and subsector(s) of any co-located industrial activity for which you are requesting permit coverage:				
Sector: A Subsector: A 4 Sector: D Subsector: D 1 Sector: F Subsector: F 4				
Sector: N Subsector: N 2 Sector: O Subsector: O 1 Sector: A A Subsector: A A 1				
(Not N1)  If you are a Sector S (Air Transportation) facility, do you anticipate using more than 100,000 gallons of pure glycol in glycol-based ditions of more of urea on an average annual basis?   YES  NO	deicing fluids and/or 100			
If you are a Sector G (Metal Mining) facility, do you have discharges from waste rock and overburden piles? 🔲 YES 🔠 NO				
Check the type of ore you mine at your facility: 🔲 Tungsten Ore 🔲 Nickel Ore 🔲 Alumi	inum Ore			
	Uranium, Radium, nd/or Vanadium Ore			
9, Is your facility presently inactive and unstaffed?* 🔲 YES 🔳 NO				
* Note that if your facility becomes inactive and unstaffed during the permit term, you must submit an NOI modification to reflect the change.				
E. Discharge Information				
1. By indicating "Yes" below, I confirm that I understand that the MSGP only authorizes the allowable stormwater discharges in Part 1.1.2 non-stormwater discharges listed in Part 1.1.3. Any discharges not expressly authorized in this permit cannot become authorized or ship under CWA section 402(k) by disclosure to EPA, state, or local authorities after issuance of this permit via any means, including the Not be covered by the permit, the Stormwater Pollution Prevention Plan (SWPPP), during an inspection, etc. If any discharges requiring NP other than the allowable stormwater and non-stormwater discharges listed in Parts 1.1.2 and 1.1.3 will be discharged, they must be converted by the permit.   YES	ielded from liability office of Intent (NOI) to PDES permit coverage			
2. Federal Effluent Limitation Guidelines				
Are you requesting permit coverage for any stormwater discharges subject to effluent limitation guidelines?				

40 CFR Part/Subpart	Eligible Discharges	Affected MSGP Sector	New Source Date	Check if Applicable
Part 411, Subport C	Runoff from material storage piles at cement manufacturing facilities	Ē	2/20/1974	
Part 418 Subpart A	Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished product, by-products or waste products (SIC 2874)	С	4/8/1974	
Part 423	Coal pile runoff at steam electric generating facilities	0	11/19/1982 10/8/1974 <sup>1</sup>	
Part 429, Subpart I	Discharges resulting from spray down or intentional wetting of logs at wet deck storage areas	A	1/26/1981	
Part 436, Subpart B, C, or D	Mine dewatering discharges at crushed stone mines, construction sand and gravel mines, or industrial sand mines	J	N/A	
Part 443, Subpart A	Runoff from asphalt emulsion facilities	D	7/28/1975	■
Part 445, Subparts A & B	Runoff from hazardous waste and non-hazardous waste landfills	K, L	2/2/2000	
Part 449	Runoff containing urea from airfield pavement deicing at existing and new primary airports with 1,000 or more annual non-propeller aircraft departures	S	6/15/2012	

NSPS promulgated in 1974 were not removed via the 1982 regulation; therefore wastewaters generated by Part 423-applicable sources that were New Sources under the 1974 regulations are subject to the 1974 NSPS.

#### 3. Receiving Waters Information: (Attach a separate list if necessary) Note: Refer to Enclosure 3 for NetDMR Outfall-specific Sector and Impaired Waters Limit Sets.

	e stormwater outfalls	For each outfall, provide the following	receiving water information:	f
must be ide 3-digit ID (e provide the	entified by a unique e.g., 001, 002). Also e latitude and n degrees decimal for	Provide the name of the first water of the U.S. that receives stormwater directly from the outfall and/or from the MS4 that the outfall discharges to:	If the receiving water is impaired (on the CWA 303(d) list), list the pollutants that are causing the impairment:	If a TMDL been completed for this receiving waterbody, providing the following information:
Ouffall ID	002 (Sector AA, Subsector AA1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper, dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs]; 00010 Temperature,	TMDL Name and ID:
Latitude	35.875797			Pollutant(s) for which there is a TMDL:
Longitude	-106.327580		00010 Temperature, water deg. centigrade	N/A
Outfall ID	005 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID:
Latitude	35.873919	dissolved [as Cu]; 39516 Polychlorinated	Pollutant(s) for which there is a TMDL:	
Longitude	-106.320746	•	00010 Temperature, water deg. centigrade	N/A

Outfall ID	006 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID:	
Latitude	35.874011		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.319858		00010 Temperature, water deg. centigrade	N/A	
If <mark>substanti</mark>	ally identical to other o	outfall, list identical outfall ID: 005		•	
Outfall ID	009 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A	
Latitude	35.874843		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.319412	ą.	00010 Temperature, water deg. centigrade	N/A	
lf substantic	ally identical to other o	outfall, list identical outfall ID:	*		
Outfall ID	007 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A	
Latitude	35.874014		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.319203		00010 Temperature, water deg. centigrade	N/A	
lf <mark>substantic</mark>	ı <mark>lly identical</mark> to other o	utfall, list identical outfall ID: 009			
Ouffall ID	008 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A	
Latitude	35.874617		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.318925		00010 Temperature, water deg. centigrade	N/A	
	If <mark>substantially identical</mark> to other outfall, list identical outfall ID: 009				

	*	W/		
Outfall ID	010 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID:
Latitude	35.875402		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.320301		00010 Temperature, water deg. centigrade	N/A
If <mark>substanti</mark>	<mark>ally identical</mark> to other o	utfall, list identical outfall ID: 009		
Outfall ID	012 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A
Latitude	35.875532		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.320884		00010 Temperature, water deg. centigrade	N/A
If substantic	ally identical to other o	utfall, list identical outfall ID:		
Outfall ID	011 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A
Latitude	35.875563		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.320744		00010 Temperature, water deg. centigrade	N/A
lf <mark>substantia</mark>	<mark>illy identical t</mark> o other o	u <mark>tfall,</mark> list identical outfall ID: 012		
Ouffall ID	017 (Sectors AA, F Subsectors AA1, F4)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A
Latitude	35.872599	33.)	dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.317066		00010 Temperature, water deg. centigrade	N/A
if substantia	lly identical to other ou	ıtfall, list identical outfali ID:		l)

Outfall ID	013 (Sectors AA, F Subsectors AA1, F4)	Mortandad Canyon (Within LANL)	51931 Adjusted Gross Alpha; 01040 Copper,	TMDL Name and ID: N/A
Latitude	35.870797		dissolved [as Cu]; 71900 Mercury, total [as Hg];	Pollutant(s) for which there is a TMDL:
Longitude	-106.317867		39516 Polychlorinated biphenyls [PCBs]	N/A
lf <mark>substanti</mark>	ally identical to other o	u <mark>tfall,</mark> list identical outfall ID: <u>017</u>		
Outfall ID	014 (Sectors AA, F Subsectors AA1, F4)	Mortandad Canyon (Within LANL)	51931 Adjusted Gross Alpha; 01040 Copper,	TMDL Name and ID: N/A
Latitude	35.870890		dissolved [as Cu]; 71900 Mercury, total [as Hg];	Pollutant(s) for which there is a TMDL:
Longitude	-106.317393	ē.	39516 Polychlorinated biphenyls [PCBs]	N/A
If <mark>substantic</mark>	<mark>ılly identical</mark> to other ou	u <mark>tfall,</mark> list identical outfall ID: 017	· · · · · · · · · · · · · · · · · · ·	•
Outfall ID	015 (Sectors AA, F Subsectors AA1, F4)	Mortandad Canyon (Within LANL)	51931 Adjusted Gross Alpha; 01040 Copper,	TMDL Name and ID:
Latitude	35.871389		dissolved [as Cu]; 71900 Mercury, total [as Hg];	Pollutant(s) for which there is a TMDL:
Longitude	-106.316397		39516 Polychlorinated biphenyls [PCBs]	N/A
If <mark>substantia</mark>	<mark>lly identical</mark> to other ou	otfall, list identical outfall ID: 017		
Outfall ID	016 (Sectors AA, F Subsectors AA1, F4)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A
Latitude	35.872447	/	dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.316721	-	00010 Temperature, water deg. centigrade	N/A
If <mark>substantia</mark>	<mark>lly identical</mark> to other ou	<mark>tfall,</mark> list identical outfall ID: <u>017</u>		

Outfall ID	019 (Sectors AA, F Subsectors AA1, F4)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID:
Latitude	35.872682	-	dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.318467		00010 Temperature, water deg. centigrade	N/A
If substantio	ally identical to other o	utfall, list identical outfall ID: 017		
Outfall ID	020 (Sectors AA, F Subsectors AA1, F4)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A
Lafitude	35.872240	,	dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.316340		00010 Temperature, water deg. centigrade	N/A
If substantio	ılly identical to other ou	utfall, list îdentical outfall ID:	• •	
Ouffall ID	022 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A
Latitude	35.872661		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.313691		00010 Temperature, water deg. centigrade	N/A
lf substantia	lly identical to other ou	rtall, list identical outfall ID:		
Outfall ID	021 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A
Latitude	35.872514	•,	dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.313562		00010 Temperature, water deg. centigrade	N/A
if <mark>substantia</mark>	lly identical to other ou	t <mark>fall,</mark> list identical outfall ID: 022		
			<del></del>	

Ouffall ID	023 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A
Latitude	35.873193		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.313116		00010 Temperature, water deg. centigrade	N/A
If <mark>substanti</mark>	ally identical to other o	outfall, list identical outfall ID: 022	<u>.</u>	
Outfall ID	024 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A
Latitude	35.873046		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.315069		00010 Temperature, water deg. centigrade	N/A
If <mark>substantic</mark>	ally identical to other o	utfall, list identical outfall ID: 022		
Outfall ID	025 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A
Latitude	35.872928		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.315400		00010 Temperature, water deg. centigrade	N/A
If <mark>substantio</mark>	<mark>illy identical</mark> to other o	utfall, list identical outfall ID: 022		
Outfall ID	026 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A
Latitude	35.872114	) /-	dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.313105		00010 Temperature, water deg. centigrade	N/A
If substantia	lly identical to other o	utfall, list identical outfall ID:		

		·			
Outfall ID	027 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A	
Latitude	35.872401		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.313391		00010 Temperature, water deg. centigrade	N/A	
If <mark>substantio</mark>	a <mark>lly identical</mark> to other o	utfall, list identical outfall ID: 026			
Ouffall ID	028 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A	
Latitude	35.872505		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.313542	L.	00010 Temperature, water deg. centigrade	N/A	
If substantially identical to other outfall, list identical outfall ID: 026					
Outfall ID	029 (Sector N, Subsector N2)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A	
Latitude	35.873969		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.313281		00010 Temperature, water deg. centigrade	N/A	
If substantially identical to other outfall, list identical outfall ID:					
Outfall ID	031 (Sector P, Subsector P1)	Mortandad Canyon (within LANL)	51931 Adjusted Gross Alpha; 01040 Copper,	TMDL Name and ID: N/A	
Latitude	35.869227		dissolved [as Cu]; 71900 Mercury, total [as Hg];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.305685		39516 Polychlorinated biphenyls [PCBs]	N/A	
If substantially identical to other outfall, list identical outfall ID:					

Outfall ID	030 (Sector P, Subsector P1)	Mortandad Canyon (within LANL)	51931 Adjusted Gross Alpha; 01040 Copper,	TMDL Name and ID:	
Latitude	35.869325		dissolved [as Cu]; 71900 Mercury, total [as Hg];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.306926		39516 Polychlorinated biphenyls [PCBs]	N/A	
If <mark>substanti</mark>	<mark>ally identical</mark> to other (	outfall, list identical outfall (D: 031		<u> </u>	
Ouffall ID	032 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A	
Latitude	35.870741		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.306812		00010 Temperature, water deg. centigrade	N/A	
If substantially identical to other outfall, list identical outfall ID:					
Outfall ID	033 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A	
Latitude	35.870712		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.306443		00010 Temperature, water deg. centigrade	N/A	
If <mark>substantially identical</mark> to other outfall, list identical outfall ID: 032					
Outfall ID	034 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A	
Latitude	35.870603		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.306055		00010 Temperature, water deg. centigrade	N/A	
If <mark>substantially identical to other outfall,</mark> list identical outfall ID: 032					

Outfall ID	035 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID:	
Latitude	35.870474		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.305432		00010 Temperature, water deg. centigrade	N/A	
If <mark>substanti</mark>	<mark>ally identical</mark> to other o	utfall, list identical outfall ID: 032			
Outfall ID	036 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A	
Latitude	35.867825		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.293388		00010 Temperature, water deg. centigrade	N/A	
If substantially identical to other outfall, list identical outfall ID:					
Outfall ID	037 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A	
Latitude	35.867859	001)	dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.292992		00010 Temperature, water deg. centigrade	N/A	
If substantially identical to other outfall, list identical outfall ID: 036					
Ouffall ID	039 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A	
	35.867826	,	dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Latitude		l.	00040 T	LAIZA	
Latitude Longitude	-106.291726		00010 Temperature, water deg. centigrade	N/A	

Ouffall ID	038 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID:	
Latitude	35.867855		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.292211		00010 Temperature, water deg. centigrade	N/A	
If <mark>substantic</mark>	<mark>ally Identical</mark> to other o	utfall, list identical outfall ID: 039			
Outfall ID	040 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A	
Latitude	35.867839		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.291955		00010 Temperature, water deg. centigrade	N/A	
If substantially identical to other outfall, list identical outfall ID: 039					
Outfall ID	042 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A	
Latitude	35.867047		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.289163		00010 Temperature, water deg. centigrade	N/A	
If substantially identical to other outfall, list identical outfall ID:					
Ouffall ID	041 (Sector P, Subsector P1)	Mortandad Canyon (within LANL)	51931 Adjusted Gross Alpha; 01040 Copper,	TMDL Name and ID: N/A	
Latitude	35.866377		dissolved [as Cu]; 71900 Mercury, total [as Hg];	Pollutant(s) for which there is a TMDL:	
Longitude	-106.291397		39516 Polychlorinated biphenyls [PCBs]	N/A	
If substantially identical to other outfall, list identical outfall ID: 042					

Outfall ID	043 (Sector P, Subsector P1) 35.866084	Mortandad Canyon (within LANL)	51931 Adjusted Gross Alpha; 01040 Copper, dissolved [as Cu]; 71900 Mercury, total [as Hg]; 39516 Polychlorinated	TMDL Name and ID: N/A  Pollutant(s) for which there is a TMDL: N/A
Longitude	-106.290165		biphenyls [PCBs]	#3
If substantio	ally identical to other o	utfall, list identical outfall ID:		
Outfall ID	074 (Sector A, Subsector A4)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A
Latitude	35.875034		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.327328		00010 Temperature, water deg. centigrade	N/A
If substantic	ally identical to other or	utfall, list identical outfall ID:	#	
Ouffall ID	073 (Sector A, Subsector A4)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A
Latitude	35.874819		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.324283		00010 Temperature, water deg. centigrade	N/A
If <mark>substantia</mark>	<mark>ılly identical</mark> to other o	utfall, list identical outfall ID: 074	•	
Outfall ID	075 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A
Latitude	35.871154	,	dissolved [as Cu], 39516 Polychlorinated biphenyls [PCBs],	Pollutant(s) for which there is a TMDL:
Longitude	-106.312940		00010 Temperature, water deg. centigrade	N/A
If substantia	lly identical to other ou	ıtfall, list identical outfall ID:		

4. Provide the following Information about your outfall latitude longitude:
Latitude/Longitude Data Source:
If you used a USGS topographic map, what was the scale?
Horizontal Reference Datum: NAD 27 🔳 NAD 83 🔲 WGS 84
5. Does your facility discharge into a Muncipal Separate Storm Sewer System (MS4)? 🔲 YES 🔳 NO
If yes, provide the name of the MS4 operator; N/A
6. Check if you discharge to any of the waters of the U.S. that are designated by the state or tribal authority under its antidegradation policy as a Tier 2 (or Tier 2,5) water (water quality exceeds levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water) or as a Tier 3 water (Outstanding National Resource Water)? (See Appendix L).
☐ Tier 2/2,5, Provide the name(s) of receiving water(s):
☐ Tier 3 (Outstanding National Resource Waters)*
* Note: You are ineligible for coverage if you are a new discharger or new source to waters designated as Tier 3 (outstanding national resource waters) for antidegradation purposes under 40 CFR 131.13(a)(3).  7. If you are subject to benchmark monitoring requirements for a hardness-dependent metal, what is the hardness of your receiving water(s) (see Appendix J)?  82 [mg/L]
8. If you are subject to benchmark monitoring requirements for a hardness-dependent metal, does your facility discharge into any saltwater receiving waters?  YES INO
9. Does your facility discharge to a federal CERCLA site listed in Appendix P? 🔲 YES 📗 NO
If yes, did you notify the EPA Regional Office in advance of filing your NOI, and did the EPA Regional Office determine that you are eligible for permit
coverage pursuant to Part 1.1.4.10*? TYES TO NO  * Note: If you discharge to a federal CERCLA site listed in Appendix P, you are ineligible for coverage under this permit unless you notify the EPA Regional
Office in advance and the EPA Regional Office determines you are eligible coverage under this permit. In determining your eligibility for coverage under this Part, the EPA Regional Office may evaluate whether you have included adequate controls and/or procedures to ensure that your discharges will not lead to recontamination of aquatic media at the CERCLA Site such that it will to cause or contribute to an exceedance of a water quality standard.
F. Stormwater Pollution Prevention Plan (SWPPP) Information
1. Has the SWPPP been prepared in advance of filing this NOI, as required?   YES NO
2. SWPPP Contact Information:
First Name, Middle Initial, Last Name: Hollly L L Wheleller   Hollly
Professional Title: Environmentall Professional
Phone: 505 - 667 - 1312 Ext
E-mail: hbenson@lanl.gov
3. SWPPP Availability: Your current SWPPP or certain information from your SWPPP must be made available through one of the following two options. Select one of the options and
provide the required information*:
* Note: You are not required to post any confidential business information (CBI) or restricted information (as defined in Appendix A) (such information may be redacted), but you must clearly identify those portions of the SWPPP that are being withheld from public access.
Option 1: Maintain a current copy of your SWPPP on an Internet page (Universal Resource Locator or URL),
Provide the web address URL: eprr.lanl.gov
☐ Option 2: Provide the following information from your SWPPP:
A. Describe your onsite industrial activities exposed to stormwater (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams), and potential spill and leak areas:

B. List the pollutant(s) or pollutant constituent(s) associated with each industrial activity exposed to stormwater that could be discharged in stormwater and	
authorized non-stormwater discharges listed in Part 1,1.3:	
C. Describe the control measures you will employ to comply with the non-numeric technology-based effluent limits required in Part 2.1.2 and Part 8, and an other measures taken to comply with the requirements in Part 2,2 Water Quality-Based Effluent Limitations (see Part 5.2.4):	У
D. Provide a schedule for good housekeeping and maintenance (see Part 5.2.5.1) and a schedule for all inspections required in Part 4 (see Part 5.2.5,2);	
G. Endangered Species Protection	
<ol> <li>Using the instructions in Appendix E of the MSGP, under which endangered species criterion listed in Part 1.1,4.5 are you eligible for coverage under this permit (only check 1 box)?*</li> </ol>	
□ A □ B □ C ■ D □ E	
Note: After you submit your NOI and before your NOI is authorized, EPA may notify you if any additional controls are necessary to ensure your discharges have no likely adverse affects on listed species and critical habitat.	S
have no likely adverse affects on listed species and critical habitat.  2. Provide a brief summary of the basis for the criterion selected in Appendix E (e.g., communication with U.S. Fish and Wildlife Service or National Marine Fisheries Service to determine no species in action area; implementation of controls approved by EPA and the Services):	s
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H. Historic Preservation									
1. If your facility is not located on Indian country lands, is your facility located on a properly of religious or cultural significance to an Indian tribe?  ■ YES □ NO									
If yes, provide the name of the Indian tribe associated with the property: San Ildefonso Pueblo									
2, Using the instructions in Appendix F of the MSGP, under which historic properties preservation criterion listed in Part 1.1.4.6 are you eligible for coverage under this permit (only check 1 box)?									
□A ■B □C □D									
I. Certification Information									
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted, Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete, I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.									
First Name, Middle Initial, Last Name: Michael WHazen									
Title: Associate Laboratory Director									
Signature: Date: 10/01/2018									
E-mail: mhazen@lanl.gov									

# **ENCLOSURE 3**

NetDMR Monitoring Requirements for Los Alamos National Laboratory, Operated by Triad National Security, LLC

EPC-DO: 18-358

LA-UR-18-29182

					Proposed			ELG, Modifie the NM Water	ed Benchma Quality Star	rk, and Impa idards (20.6.	ired Waters Lim 4.900 NMAC [Ne	its per N ew Mexi	ISGP Secti co Admini	on 9.6.2 strative	and Codel)		
Permit ID	Facility	Permitted Feature		Subsector	Consolidated Discharge # (Limit Set)	Discharge Description	Parameter Code		Symbol	Quality Value	Limit Type	Units	Freq. of	Smpl.	Monitoring Period	Monitoring Period End	DMR Due
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=		Maximum	_	_			Date	Date
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=		Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/201
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=		Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/201
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=		Maximum	mg/L	1/60	Gr	4/1/2019	5/31/2019	
rBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=		Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	Anna Anna Anna Anna Anna Anna Anna Anna
rBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=		/Jaximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/201
BD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=		//aximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/201
BD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=		//aximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/201
BD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=			ug/L	1/60	Gr	6/1/2019	7/31/2019	
BD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=		/laximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/201
BD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total			Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	
BD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=		1aximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	11/30/201
BD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=		1aximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/201
BD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=		1aximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/202
BD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating		Nitrite Plus Nitrate Total	<=		1aximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating			<=		laximum	mg/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	002	AA	AA1	002-IW	IW - Impaired Water		Zinc, dissolved [as Zn]	<=		laximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	002	AA	AA1	002-IW	IW - Impaired Water		Aluminum, total recoverable [as Al]	<=	1010 M	laximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	002	AA	AA1	002-IW	IW - Impaired Water		Copper, dissolved [as Cu]	<=	7 M	laximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	002	AA	AA1		IW - Impaired Water		Polychlorinated biphenyls [PCBs]	<=	0.2 M	laximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
in the contract of the contrac	1,449				002.11	inputed vater	00010 1 0	Temperature, water deg. centigrade	<=	24 M	aximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	005	0	01	005-01	O1 - Steam Electric Generating Facilities									17 27 23 23	11/30/2013	1/31/2020
BD	Los Alamos National Laboratory	005	0	01	005-01	O1 - Steam Electric Generating Facilities O1 - Steam Electric Generating Facilities		Iron, total [as Fe]	<=	1000 M	aximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/21/201
BD	Los Alamos National Laboratory	005	0	01	005-01	O1 - Steam Floatric Generating Facilities		Iron, total [as Fe]	<=	1000 M		ug/L	1/60	Gr	6/1/2019	7/31/2019	7/31/2019
BD	Los Alamos National Laboratory	005	0	01	005-01	O1 - Steam Electric Generating Facilities		Iron, total [as Fe]	<=	1000 M		ug/L	1/60	Gr	8/1/2019		9/30/2019
BD	Los Alamos National Laboratory	005	0	01		O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000 M		ug/L	1/60	Gr	10/1/2019		11/30/2019
BD	Los Alamos National Laboratory	005	0			W - Impaired Water	0110410	Aluminum, total recoverable [as Al]	<=	1010 Ma		ug/L	1/YR	Gr		11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	005	0	01		W - Impaired Water		Copper, dissolved [as Cu]	<=		aximum	ug/L	1/YR	Gr		11/30/2019	1/31/2020
BD		005		01		W - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=		aximum	ug/L	1/YR		4/1/2019	11/30/2019	1/31/2020
טפ	Los Alamos National Laboratory	005	0	01	005-IW	W - Impaired Water		Temperature, water deg. centigrade	<=			-		Gr	4/1/2019	11/30/2019	1/31/2020
D.D.	I Al-	200								27 1016	aximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	009	0	01	009-01	O1 - Steam Electric Generating Facilities	01045 1 0	lron, total [as Fe]	<=	1000 Ma	avina una	- /1	1/50				
BD	Los Alamos National Laboratory	009	0	01		O1 - Steam Electric Generating Facilities		ron, total [as Fe]	<=	1000 Ma		ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
BD	Los Alamos National Laboratory	009	0	01		01 - Steam Electric Generating Facilities		ron, total [as Fe]	<=	1000 Ma		ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
BD	Los Alamos National Laboratory	009	0	01		01 - Steam Electric Generating Facilities		ron, total [as Fe]	<=	1000 Ma		ug/L	1/60	Gr	8/1/2019		11/30/2019
BD	Los Alamos National Laboratory	009	0	01	009-IW	W - Impaired Water		Aluminum, total recoverable [as Al]	<= \-			ug/L	1/60	Gr		11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	009	0	01		W - Impaired Water	01040 1 0	Copper, dissolved [as Cu]		1010 Ma		ug/L	1/YR	Gr		11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	009	0	01	009-IW I	W - Impaired Water		Polychlorinated biphenyls [PCBs]	<=			ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	009	0	01		W - Impaired Water		emperature, water deg. centigrade	<=	0.2 Ma		ug/L	1/YR	Gr		11/30/2019	1/31/2020
								congenatore, water deg. centigrade	<=	24 Ma	ximum	deg C	1/YR	Gr	4/1/2019	PSPANORAL COLUMN	1/31/2020
	Los Alamos National Laboratory	012	0	01	012-01	01 - Steam Electric Generating Facilities	01045 1 0	ron, total [as Fe]		2 4 4 4 4							
BD	Los Alamos National Laboratory	012	0	01		21 - Steam Electric Generating Facilities		ron, total [as Fe]	<=	1000 Ma		ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
3D	Los Alamos National Laboratory	012	0	01		1 - Steam Electric Generating Facilities			<=	1000 Ma:		ug/L	1/60	Gr	6/1/2019		9/30/2019
3D	Los Alamos National Laboratory	012	0	01		1 - Steam Electric Generating Facilities		ron, total [as Fe]	<=	1000 Ma:		ug/L	1/60	Gr	8/1/2019		11/30/2019
3D	Los Alamos National Laboratory	012	0	01		N - Impaired Water		ron, total [as Fe]	<=	1000 Max	ximum	ug/L	1/60				1/31/2020
3D	Los Alamos National Laboratory	012	0	01		N - Impaired Water		luminum, total recoverable [as Al]	<=	1010 Max		ug/L	1/YR	Gr			1/31/2020
3D	Los Alamos National Laboratory	012	0	01		W - Impaired Water		opper, dissolved [as Cu]	<=		ximum		1/YR	Gr			1/31/2020
	Los Alamos National Laboratory	012	0	01		V - Impaired Water		olychlorinated biphenyls [PCBs]	<=	0.2 Max			1/YR	Gr			1/31/2020
					012 100	· unpaned water	00010 1 0 To	emperature, water deg. centigrade	<=	24 Max			1/YR	Gr			1/31/2020
3D	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11 1	1. Enhanced Motel Brade							A7#12 RW		., 2, 2013	11/30/2015	1/31/2020
	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11 1	1- Fabricated Metal Products, except Coating		luminum, total recoverable [as Al]	<=	1010 Max	kimum	ug/L	1/60	Gr	4/1/2019	5/21/2010	7/24/2046
	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11 1	1- Fabricated Metal Products, except Coating		opper, dissolved [as Cu]	<=				1/60	Gr			7/31/2019
	Los Alamos National Laboratory	017			017-11 1	1- Fabricated Metal Products, except Coating		on, total [as Fe]	<=	1000 Max			1/60	Gr			7/31/2019
	Los Alamos National Laboratory	017	AA, F	AA1, F4		1- Fabricated Metal Products, except Coating		itrite Plus Nitrate Total	<=	0.68 Max			1/60	Gr			7/31/2019
,,,	ros ciamos ivarional raporatory	OT/	AA, F	AA1, F4	017-11  1	1- Fabricated Metal Products, except Coating	01090 1 0 Zi	nc, dissolved [as Zn]		ux	rimum (	5/-	1/00	GI I	4/1/2019	5/31/2019	7/31/2019

								ELG, Modifie	d Benchma	rk, and Imp	aired Waters Lim	its per N	/ISGP Sect	ion 9.6.2	and		
					Proposed			the NM Water	Quality Star	dards (20.6	6.4.900 NMAC [N	ew Mexi	ico Admin	istrative (	Code])		
Permit ID	Facility	Permitted Feature	Sector(s)	Subsector	Consolidated Discharge #	Direbone Description	Paramete	r		Quality			Freq. o	f Smpl.	Monitoring Period	Monitoring Period End	DMR Due
	· · · · · · · · · · · · · · · · · · ·	+			<u> </u>	Discharge Description	Code	Parameter Name	Symbol	Value	Limit Type	Units	Analysi	Type	Start Date	Date	Date
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/60	Gr	6/1/2019		
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/60	Gr		7/31/2019	9/30/201
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4		11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=		Maximum	ug/L	1/60		6/1/2019	7/31/2019	1.00
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4		11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=		Maximum			Gr	6/1/2019	7/31/2019	Co. #. C. A. C. A. B. C. C. A. C. C.
BD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=		Maximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/201
BD	Los Alamos National Laboratory	017	AA, F	AA1, F4		11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=		Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/201
BD	Los Alamos National Laboratory	017	AA, F	AA1, F4		11- Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/201
BD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=		Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	
BD	Los Alamos National Laboratory	017	AA, F	AA1, F4		11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=		Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/201
BD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=			mg/L	1/60	Gr	8/1/2019	9/30/2019	
BD	Los Alamos National Laboratory	017	AA, F	AA1, F4		11- Fabricated Metal Products, except Coating	0110410	Aluminum, total recoverable [as Al]			Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/201
BD .	Los Alamos National Laboratory	017	AA, F	AA1, F4		11- Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/202
BD	Los Alamos National Laboratory	017	AA, F	AA1, F4		11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/202
BD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	51450 1 0		<=		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/202
BD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01090 1 0	Nitrite Plus Nitrate Total	<=		Maximum	mg/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-IW	IW - Impaired Water		Zinc, dissolved [as Zn]	<=		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-IW	IW - Impaired Water		Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	017	AA, F	AA1, F4		IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=	7 [	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	017	AA, F	AA1, F4		IW - Impaired Water	3951610	Polychlorinated biphenyls [PCBs]	<=	0.2	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
	200 1 110 110 110 110 110 110 110 110 11	01/	7,7,7,1	ALCO TO	017-100	TWO - Impaired water	00010 1 0	Temperature, water deg. centigrade	<=	24	Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Martal Barrier										,,	1/31/1020
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4		11- Fabricated Metal Products, except Coating		Aluminum, total recoverable [as Al]	<=	1010 N	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
BD	Los Alamos National Laboratory	020	AA, F		020-11	11- Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
-				AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=		Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4		11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=		Maximum	mg/L	1/60	Gr	4/1/2019	5/31/2019	
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4		11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=		Maximum	ug/L	1/60	Gr	4/1/2019		7/31/2019
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=		Maximum	ug/L	1/60	Gr	6/1/2019	5/31/2019	7/31/2019
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/60	Gr		7/31/2019	9/30/2019
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4		11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=		Maximum	ug/L	1/60	_	6/1/2019	7/31/2019	9/30/2019
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=		Maximum			Gr	6/1/2019	7/31/2019	9/30/2019
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	0109010	Zinc, dissolved [as Zn]	<=		//aximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4		11- Fabricated Metal Products, except Coating		Aluminum, total recoverable [as Al]	<=		//aximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating		Copper, dissolved [as Cu]	<=			ug/L	1/60	Gr	8/1/2019		11/30/2019
	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	1- Fabricated Metal Products, except Coating		Iron, total [as Fe]			/laximum	ug/L	1/60	Gr	8/1/2019		11/30/2019
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating		Nitrite Plus Nitrate Total	<=		/laximum	ug/L	1/60	Gr	8/1/2019		11/30/2019
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11 1	1- Fabricated Metal Products, except Coating		Zinc, dissolved [as Zn]	<=		laximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11 1	1- Fabricated Metal Products, except Coating		Aluminum, total recoverable [as Al]	<=		1aximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11 1	1- Fabricated Metal Products, except Coating			<=		1aximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11 1	1- Fabricated Metal Products, except Coating		Copper, dissolved [as Cu]	<=		1aximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	020	AA, F	AA1, F4		1- Fabricated Metal Products, except Coating		Iron, total [as Fe]	<=		1aximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
	Los Alamos National Laboratory	020	AA, F	AA1, F4		1- Fabricated Metal Products, except Coating		Nitrite Plus Nitrate Total	<=		laximum	mg/L	1/60	Gr			1/31/2020
	Los Alamos National Laboratory	020		AA1, F4		W - Impaired Water		Zinc, dissolved [as Zn]	<=		laximum	ug/L	1/60				1/31/2020
	Los Alamos National Laboratory	020		AA1, F4		W - Impaired Water	SERVICE CONTRACTOR	Aluminum, total recoverable [as Al]	<=		laximum	ug/L	1/YR	Gr		11/30/2019	1/31/2020
	Los Alamos National Laboratory	020	AA, F	AA1, F4		W - Impaired Water  W - Impaired Water		Copper, dissolved [as Cu]	<=	7 M	laximum	ug/L	1/YR	Gr		11/30/2019	1/31/2020
	Los Alamos National Laboratory	020		AA1, F4				Polychlorinated biphenyls [PCBs]	<=	0.2 M	laximum	ug/L	1/YR	Gr		11/30/2019	1/31/2020
-	203 Alamos National Cabolatory	020	лл, г	7A1, F4	UZU-1VV	N - Impaired Water	00010 1 0	Temperature, water deg. centigrade	<=	24 M	laximum	deg C	1/YR	Gr		11/30/2019	1/31/2020
3D	Los Alamos National Laboratory	022	Р	D1	022 114	AT 1 COMPONED VALUE								-	., ., ., .	11/30/2013	1/31/2020
			P	P1		N - Impaired Water		Aluminum, total recoverable [as Al]	<=	1010 M	aximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/21/2020
	Los Alamos National Laboratory	022	P P	P1		N - Impaired Water		Copper, dissolved [as Cu]	<=			ug/L	1/YR	Gr			1/31/2020
	Los Alamos National Laboratory	022	۲	P1		N - Impaired Water	39516 1 0 F	Polychlorinated biphenyls [PCBs]	<=			ug/L	1/YR	Gr	10/10/10/10	CONTRACTOR CONTRACTOR CONTRACTOR	1/31/2020
BD	Los Alamos National Laboratory	022	Р	P1	022-IW IV	V - Impaired Water		emperature, water deg. centigrade	<=				1/YR				1/31/2020
	Marco Star Marco School Control Contro							- 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		2.4 101	e-minarii	ucg C	T/1K	Gr	4/1/2019	11/30/2019	1/31/2020
	Los Alamos National Laboratory	026	Р	P1		V - Impaired Water	0110410 A	lluminum, total recoverable [as Al]	<=	1010 Ma	avimum	ua/i	1//0		A /a /pp: -	4 4 10 0 10 -	4 6-1
3D	Los Alamos National Laboratory	026	Р	P1	026-IW IV	V - Impaired Water		opper, dissolved [as Cu]					1/YR		4/1/2019	11/30/2019	1/31/2020
_	Los Alamos National Laboratory	026	P	P1	026-IW IV	V - Impaired Water	0104010	opper, dissolved las cui	<=	7114	aximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020

					Proposed			ELG, Modifie the NM Water	d Benchma Quality Star	rk, and Imp idards (20.	paired Waters Lin 6.4.900 NMAC [N	nits per N lew Mexi	ASGP Sect	on 9.6.2	and Code])		
Permit ID	Facility			Subsector	Consolidated Discharge # (Limit Set)	Discharge Description	Parameter Code		Symbol	Quality Value	Limit Type	Units	Freq. o	f Smpl.		Monitoring Period End Date	DMR Due
TBD	Los Alamos National Laboratory	026	Р	P1	026-IW	IW - Impaired Water	00010 1 0	Temperature, water deg. centigrade	<=	24	Maximum	deg C		Gr	4/1/2019		Date
TOD	Lac Alamas National Laboratory	020	N	NO	020 1111							- BUB C	1 4/11	- 01	4/1/2019	11/30/2019	1/31/202
TBD TBD	Los Alamos National Laboratory  Los Alamos National Laboratory	029	N	N2 N2	029-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/202
TBD	Los Alamos National Laboratory	029	N	N2 N2	029-IW 029-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	
TBD	Los Alamos National Laboratory	029	N	N2 N2		IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=	0.2	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/202
100	Los Alamos National Laboratory	023	<u> </u>	INZ	029-IW	IW - Impaired Water	00010 1 0	Temperature, water deg. centigrade	<=		Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/202
TBD	Los Alamos National Laboratory	031	Р	P1	031-IW	IW - Impaired Water									4,400	11/30/2013	1/31/202
TBD	Los Alamos National Laboratory	031	P	P1	031-IW	IW - Impaired Water	51931 1 0	Adjusted Gross Alpha	<=	15	Maximum	pCi/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/202
TBD	Los Alamos National Laboratory	031	P	P1	031-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/202
_	Los Alamos National Laboratory	031	P	P1	031-IW	IW - Impaired Water	71900 1 0	Mercury, total [as Hg]	<=	0.77	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/202
100	2007 Harries National Eagoratory	051			031-100	inpaired water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=	0.2	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	
TBD	Los Alamos National Laboratory	032	Р	P1	032-IW	IW - Impaired Water	*****									, ,	-,52,202
	Los Alamos National Laboratory	032	P	P1		IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/202
TBD	Los Alamos National Laboratory	032	P	P1	A 50 COLUMN TO THE REAL PROPERTY AND THE REA	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	032	P	P1		IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=	0.2	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
Name .					052 110	TVV - Impanca vvater	00010 1 0	Temperature, water deg. centigrade	<=	24	Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	036	Р	P1	036-IW	IW - Impaired Water	0110110										
	Los Alamos National Laboratory	036	P	P1		IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
1000	Los Alamos National Laboratory	036	Р	P1		IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=	7	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
	Los Alamos National Laboratory	036	Р	P1		IW - Impaired Water		Polychlorinated biphenyls [PCBs]	<=	0.2	Maximum	ug/L	1/YR	Gr		11/30/2019	1/31/2020
					030 117	impaired water	00010 1 0	Temperature, water deg. centigrade	<=	24	Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	039	Р	P1	039-IW	IW - Impaired Water	044044	2									-, -, -, -, -, -,
TBD	Los Alamos National Laboratory	039	P	P1		IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
	Los Alamos National Laboratory	039	P	P1		IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=	7	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
	Los Alamos National Laboratory	039	Р	P1		IW - Impaired Water		Polychlorinated biphenyls [PCBs]	<=		Maximum	ug/L	1/YR	Gr		11/30/2019	1/31/2020
DOWNERS .					033 111		00010 1 0	Temperature, water deg. centigrade	<=	24	Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	042	Р	P1	042-IW	IW - Impaired Water	0110110										
	Los Alamos National Laboratory	042	Р	P1		W - Impaired Water		Aluminum, total recoverable [as Al]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	042	Р	P1		W - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr		11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	042	Р	P1		W - Impaired Water		Polychlorinated biphenyls [PCBs]	<=	0.2	Maximum	ug/L	1/YR	Gr		11/30/2019	1/31/2020
						mpaned Witte	00010 1 0	Temperature, water deg. centigrade	<=	24 [	Maximum	deg C	1/YR	Gr		11/30/2019	1/31/2020
						O1 - Asphalt Paving and Roofing Materials and											
ГВD	Los Alamos National Laboratory	043	D	D1	043-D1	ubricant Manufacturing	00530 1 0	Collide total surround of									
						01 - Asphalt Paving and Roofing Materials and	0033010	Solids, total suspended	<=	100	Maximum	mg/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
гво	Los Alamos National Laboratory	043	D	D1		ubricant Manufacturing	00520 1 0	Solids, total suspended									
						01 - Asphalt Paving and Roofing Materials and	0033010	Solids, total suspended	<=	100 N	Maximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
rBD	Los Alamos National Laboratory	043	D	D1		ubricant Manufacturing	00530 1 0	Solids, total suspended									
						01 - Asphalt Paving and Roofing Materials and	0033010	solius, total suspended	<=	100 N	/laximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
TBD	Los Alamos National Laboratory	043	D	D1		ubricant Manufacturing	00530 1 0	Solids, total suspended									
						D - Asphalt Paving and Roofing Materials and	0033010	solius, total suspended	<=	100 N	/laximum	mg/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	043	D	D1		ubricant Manufacturing	0055610	Oil & Grease									
						D - Asphalt Paving and Roofing Materials and	0033010	oli & drease	<=	10 3	0-Day Average	mg/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	043	D	D1		ubricant Manufacturing	0055610	Oil & Grease									
						D - Asphalt Paving and Roofing Materials and	0033010	on & Grease	<=	15 D	aily Maximum	mg/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	043	D	D1	043-1D L	ubricant Manufacturing	0040010	он									
						D - Asphalt Paving and Roofing Materials and	0040010	<i>a</i> 1	>=	6 N	finimum	SU	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	043	D	D1		ubricant Manufacturing	0040010	ьн									
						D - Asphalt Paving and Roofing Materials and	00.00010	//I	<=	9 N	laximum	SU	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	043	D	D1		ubricant Manufacturing	0053010 5	olids, total suspended									
						D - Asphalt Paving and Roofing Materials and	0000010	sonus, total suspended	<=	15 30	D-Day Average	mg/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
BD	Los Alamos National Laboratory	043	D	D1		ubricant Manufacturing	00530 1 0	olids, total suspended	. 1								
BD	Los Alamos National Laboratory	043	D	D1		V - Impaired Water		djusted Gross Alpha	<=		aily Maximum	mg/L	1/YR	Gr			1/31/2020
							1	ajastea Gross Aiplia	<=	15 M	laximum	pCi/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020

					Proposed		ELG, Modified Benchmark, and Impaired Waters Limits per MSGP Section 9.6.2 and the NM Water Quality Standards (20.6.4.900 NMAC [New Mexico Administrative Code])										
Permit ID	Facility	Permitted Feature	Sector(s)	Subsector	Consolidated Discharge # (Limit Set)	Discharge Description	Parameter Code		Symbol	Quality Value	Limit Type	Units	Freq. of	Smpl.		Monitoring Period End Date	DMR Due
TBD	Los Alamos National Laboratory	043	D	D1	043-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=	11	Maximum		<u> </u>				Date
TBD	Los Alamos National Laboratory	043	D	D1	043-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=		Maximum	ug/L ug/L	1/YR 1/YR	Gr	4/1/2019	11/30/2019	1/31/202
TBD	Los Alamos National Laboratory	043	D	D1	043-IW	IW - Impaired Water	71900 1 0	Mercury, total [as Hg]	<=		Maximum	ug/L	1/YR	Gr Gr	4/1/2019 4/1/2019	11/30/2019 11/30/2019	
												UB/ C	2/11	- Gi	4/1/2019	11/30/2019	1/31/202
TBD	Los Alamos National Laboratory	074	Α	A4	074-A4	A4 - Hardwood Dimension and Flooring Mills	81017 1 0	Chemical Oxygen Demand [COD]	<=	120	Maximum	mg/L	1/60	Gr	4/4/2040	F /04 /004 5	
TBD	Los Alamos National Laboratory	074	A	A4	074-A4	A4 - Hardwood Dimension and Flooring Mills	00530 1 0	Solids, total suspended	<=		Maximum	mg/L	1/60	_	4/1/2019	5/31/2019	
TBD	Los Alamos National Laboratory	074	Α	A4	074-A4	A4 - Hardwood Dimension and Flooring Mills	81017 1 0	Chemical Oxygen Demand [COD]	<=		Maximum	mg/L	1/60	Gr	4/1/2019	5/31/2019	
TBD	Los Alamos National Laboratory	074	Α	A4	074-A4	A4 - Hardwood Dimension and Flooring Mills	00530 1 0	Solids, total suspended	\ <=		Maximum		1/60	Gr	6/1/2019	7/31/2019	
TBD	Los Alamos National Laboratory	074	A	A4	074-A4	A4 - Hardwood Dimension and Flooring Mills	81017 1 0	Chemical Oxygen Demand [COD]	\ \ \ \ \ \		Maximum	mg/L		Gr	6/1/2019	7/31/2019	
TBD	Los Alamos National Laboratory	074	Α	A4		A4 - Hardwood Dimension and Flooring Mills	00530 1 0	Solids, total suspended	<=		Maximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	
TBD	Los Alamos National Laboratory	074	Α	A4		A4 - Hardwood Dimension and Flooring Mills	81017 1 0	Chemical Oxygen Demand [COD]	=		Maximum	mg/L	1/60 1/60	Gr	8/1/2019	9/30/2019	11/30/201
TBD	Los Alamos National Laboratory	074	Α	A4	074-A4	A4 - Hardwood Dimension and Flooring Mills	00530 1 0	Solids, total suspended	<=	137771-00	Maximum	mg/L		Gr	10/1/2019	11/30/2019	1/31/2020
TBD:	Los Alamos National Laboratory	074	Α	A4	074-IW	IW - Impaired Water		Aluminum, total recoverable [as Al]	<=		Maximum	mg/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	074	Α	A4	074-IW	IW - Impaired Water	01040 1 0	Copper, dissolved (as Cul	<=		Maximum	ug/L	1/YR 1/YR	Gr	4/1/2019	11/30/2019	
ГBD	Los Alamos National Laboratory	074	Α	A4	074-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
ГBD	Los Alamos National Laboratory	074	Α	A4	074-IW	IW - Impaired Water	00010 1 0	Temperature, water deg. centigrade	<=		Maximum	ug/L deg C	1/YR	Gr Gr	4/1/2019	11/30/2019	1/31/2020
	9										THE STATE OF THE S	uege	1/ I.K	GI	4/1/2019	11/30/2019	1/31/2020
rBD	Los Alamos National Laboratory	075	Р	P1	075-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	C.	4/1/2010	44 /20 /2040	
rBD	Los Alamos National Laboratory	075	Р	P1	075-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	075	Р	P1		IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	\ <=		Maximum		1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	075	Р	P1	075-IW	IW - Impaired Water		Temperature, water deg. centigrade	<=		Maximum	ug/L deg C	1/YR 1/YR	Gr Gr	4/1/2019 4/1/2019	11/30/2019	1/31/2020

# **ENCLOSURE 4**

Threatened and Endangered Species Protection Concurrence Letters from the United States Department of Interior, Fish and Wildlife Service

EPC-DO: 18-358

LA-UR-18-29182

Date:	OCT 0 1 2018



## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

New Mexico Ecological Services Field Office 2105 Osuna NE Albuquerque, New Mexico 87113 Phone: (505) 346-2525 Fax: (505) 346-2542

February 12, 1999

Cons. #2-22-98-I-336 Cons. #2-22-95-I-108

David A. Gurule, Acting Area Manager Department of Energy Albuquerque Operations Office Los Alamos Area Office Los Alamos, New Mexico 87545

Dear Mr. Gurule:

This responds to your letter dated August 6, 1998, requesting our review and concurrence with the Threatened and Endangered Species Habitat Management Plan (HMP) for Los Alamos National Laboratory (LANL). The HMP was prepared by the LANL Ecology Group for the Department of Energy (DOE) as part of the Dual-Axis Radiographic Hydrodynamics Test Facility (DAHRT) Mitigation Action Plan. The U.S. Fish and Wildlife Service (Service) has worked closely with LANL in the development of the HMP. As a result of discussions and meetings following the August 6, 1998, submittal, additional information/clarification was provided via letters, updated Biological Evaluations/HMPs, and e-mail messages, dated September 8, October 20, November 25, and December 9, 1998, and January 4, January 22, and January 29, 1999. The purpose of the HMP is to provide for the protection of threatened and endangered species and their habitats on LANL. The HMP consists of three components that must be used together to assure proper management of the threatened and endangered species: an Overview Document, Site Plans, and Monitoring Plans. It was determined that if all the restrictions and protective measures outlined in the HMP are strictly followed, the implementation of this HMP may affect, but is not likely to adversely affect the Mexican spotted owl (owl), peregrine falcon (falcon), bald eagle (eagle), and southwestern willow flycatcher (flycatcher). The Biological Evaluation (BE) also considered potential impacts on the black-footed ferret, arctic peregrine falcon, and whooping crane. It was determined that there would be no effect on these species because of a lack of habitat.

Property at LANL varies from remote isolation to heavily developed and/or industrialized. The Service agrees, as stated in the Overview document, that a number of activities at LANL have the potential to adversely impact threatened and endangered species. Many of the industrial processes used at LANL have involved hazardous and radioactive materials. These materials as well as remediation of potential release sites may disturb

EPC-DO: 18-358 Page 1 of 10 LA-UR-18-29182

or reduce population viability of threatened and endangered species. In addition, other potential sources of disturbance or habitat alterations are possible as a result of the residential and commercial development in the LANL area. While the HMP identifies potential sources of adverse effects, this consultation does not necessarily cover all of those impacts. The Service does not anticipate that DOE will be able to plan all of its operations at LANL in accordance with this plan. The direct effects of most actions can be minimized through implementation of the HMP; however, a more thorough assessment is necessary to adequately evaluate the indirect and cumulative impacts of all actions that are funded, authorized, and permitted by DOE, as well as potential impacts from interrelated and interdependent actions. It was agreed (by Service, DOE, and LANL personnel) that consultation concerning ongoing LANL operations would be handled separately from the HMP, under the consultation on the Site-Wide EIS.

The Site Plans identify the particular areas of LANL where operations might impact known occupied or potential habitat for the flycatcher, eagle, falcon, and owl. Suitable habitat for these species, along with protective buffer areas surrounding their habitat, have been designated as Areas of Environmental Interest (AEIs). For the flycatcher, one AEI was established based on an observation of a migrant male flycatcher in 1997. The AEI is located in the Pajarito wetland area and includes the best available riparian habitat. For eagles, one AEI has been identified for wintering habitat that exists along the Rio Grande on the eastern edge of LANL. It is based on the locations of known and potential roost sites. For the falcon, four AEIs have been identified. They consist of the habitat previously identified under the 1985 interagency agreement. These areas are centered on deep canyons on the eastern side of LANL or on adjacent lands. LANL has agreed to implement the recommended management guidelines, which utilize four management zones (A through D) to protect nesting peregrine falcons from disturbance. For the owl, six AEIs have been identified, but only one of these sites is known to be occupied. These AEIs are based on and located in canyons that have been defined as suitable nest/roost habitat.

The AEI management section of each Site Plan provides guidelines for LANL operations to reduce or eliminate threats to each species. The primary threats on LANL property are (1) impacts on habitat quality from LANL operations and (2) disturbance of nesting or roosting birds. The site plans provide information on their location and guidelines for their management. The AEI Site Plans consist of a species description, descriptions of the AEIs for the species, descriptions of current impacts in the AEIs, management plans that describe allowable activities within core and buffer areas under the guidelines of the sites plan and protective measures. Activities discussed in the site plans include day to day activities, such as access into an AEI, as well as long-term projects, such as levels of habitat alteration in the buffer area of an AEI. Restrictions will be implemented on activities that could cause disturbance (people, vehicles and machinery, aircraft, light production, and noise) within occupied AEIs. The location of a potential disturbance activity within the AEI, the occupancy status of the AEI, and the type of activity all affect whether or not an activity is allowable. Habitat alterations are always restricted in core areas, but a limited amount of future development is allowed in currently undeveloped DOE-controlled buffer areas under the guidelines of this site plan as long

as it does not alter habitat in the undeveloped AEI (including light and noise guidelines). The purpose of buffer areas is to protect core areas from undue disturbance or habitat alteration or habitat degradation. Each AEI is specific to the situation or circumstances of the site it covers. According to the HMP, development beyond the cap established for each AEI, or greater than 2 hectares in size, including the developed-area border, requires independent review for ESA compliance.

Varying amounts of development and/or ongoing activities exist in the cores and buffers of each AEI. These developments may include residential, commercial, and light industrial areas, as well as roads and utility corridors. Existing/ongoing activities may include periodic scientific surveys, power line maintenance, recreational use, residential development, ER Program activities, and possible use of a firing site. Potential disturbance may be associated with automobile and truck traffic, construction activities, a live-fire range, explosives testing, and aircraft traffic at the County airport. Ongoing activities in developed areas constitute a baseline condition for the AEIs and are not restricted. New activities including further development within already existing developed areas are not restricted unless they impact undeveloped portions of an AEI core. If a proposed action within a developed area does not meet site plan guidelines, it must be individually reviewed for ESA compliance.

Some activities such as utility corridor maintenance, fuels management, and a limited amount of development are allowed in each AEI (as described in the HMP). The potential impacts of these activities are considered to be insignificant or discountable because they will occur in habitat that has been previously disturbed or is of poor quality due to its size or proximity to already developed areas. It is our understanding (based on the January 22, 1999, e-mail response from Terry Foxx) that the fuels management activities within the owl AEIs will only consist of ongoing and proposed fire protection activities around existing facilities (e.g. thinning around buildings) or those activities that are already covered under the Dome Fire Emergency BA. The other fire management activities mentioned in the HMP will go through the ESH-ID process and further consultation with the Service when a fire management plan is completed in the future.

In general, activities that detrimentally alter habitat in an AEI or would cause unacceptable disturbance to the species inhabiting the AEI are not allowed under the guidelines of a Site Plan. The Site Plans are designed to minimize impacts to threatened and endangered species and their habitat. The protective measures and restrictions outlined in the Site Plans were developed using the best available data, in cooperation with Service biologists.

The U.S. Fish and Wildlife Service concurs with DOE's determination that implementation of LANL's HMP may affect, but is not likely to adversely affect the Mexican spotted owl, American peregrine falcon, bald eagle, and southwestern willow flycatcher based on the protective measures described in the BA and HMP. If all the restrictions and protective measures outlined in the HMP are strictly followed, potential impacts on owls, falcons, eagles, and flycatchers are expected to be insignificant or

discountable for the following reasons: 1) appropriate seasonal restrictions will be implemented to avoid disturbance to potentially breeding flycatchers, peregrines, and owls and wintering eagles; 2) no nest or roost habitat for any listed species will be altered; 3) the total amount of potential foraging habitat that could be impacted within each species home ranges is expected to be insignificant compared to the amount of available foraging habitat throughout the area; 4) monitoring plans have been developed as an integral part of the HMP; and 5) a mechanism for incorporating necessary technical and regulatory changes and updating the HMP has been included (page 32 of the Overview Document).

In future communications regarding this project, please refer to Consultation #2-22-98-1-336. If we can be of further assistance, please contact Carol Torrez of my staff at (505) 346-2525, ext. 115.

Sincerely,

Jennifer Fowler-Props

Field Supervisor

cc:

Teralene Foxx, Project Manager, Ecology Group, Los Alamos National Laboratory, P.O. Box 1663, Mail Stop M887, Los Alamos, New Mexico 87545
Elizabeth Withers, U.S. Department of Energy, Los Alamos Area Office, 35th Street, Los Alamos, New Mexico

Field Supervisor, Ecological Services, U.S. Fish and Wildlife Service, Phoenix, Arizona



## United States Department of the Interior

#### FISH AND WILDLIFE SERVICE

New Mexico Ecological Services Field Office 2105 Osuna NE Albuquerque, New Mexico 87113 Phone: (505) 346-2525 Fax: (505) 346-2542

December 9, 2013

Cons. #02ENNM00-2014-I-0014

Geoffrey L. Beausoleil, Acting Manager National Nuclear Security Administration, Los Alamos Field Office Department of Energy Los Alamos, New Mexico 87544

Dear Mr. Beausoleil:

Thank you for your biological assessment entitled, "Biological Assessment of the Effects of Implementing the Jemez Mountains Salamander Site Plan on Federally Listed Threatened and Endangered Species at Los Alamos National Laboratory" (BA); the request for informal consultation and conferencing received on July 25, 2013 and supplemental information supplied in the "Jemez Mountains Salamander (Plethodon neomexicanus) Los Alamos National Laboratory (LANL) Site Plan" (Site Plan); and emails dated November 19 and December 3, 2013. The Department of Energy (DOE) requested concurrence with the determination of effects for the endangered Jemez Mountains salamander (Plethodon neomexicanus) (salamander) pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. § 1531 et seq.). Your proposed action consists of implementing the Site Plan, and includes of the incorporation of this Site Plan into LANL's Habitat Management Plan (HMP). The HMP was consulted upon in 1999 (Consultation #2-22-981-336) as the primary mechanism to ensure compliance with the ESA at LANL. The actions described in the Site Plan and analyzed in the BA, and supplemental emails are hereby incorporated by reference. You determined that implementing the Site Plan "may affect, is not likely to adversely affect" the salamander, and includes placing restrictions on certain types of work in areas identified as core habitat for the salamander on LANL property with the purpose of ensuring that effects to the salamander from those actions identified in the Site Plan are insignificant and discountable.

The Site Plan does not include any areas within designated salamander critical habitat, indicating that no critical habitat will be affected. The Site Plan has modeled and field validated the model to identify the areas on LANL property with the highest potential to be occupied by salamanders based on habitat features for the salamander. Each area identified by the modeling is termed "Area of Environmental Interest" (AEI) and consists of a "core area" and a "buffer area". The core area habitat is defined as suitable habitat where the salamander occurs or may occur at LANL. The core area habitat consists of sections of north-facing slope that contain the required

micro-habitat to support salamanders. The buffer area is 328 feet (100 meters) wide extending outward from the edge of the core area. Only the Los Alamos Canyon AEI is known to be occupied based on surveys. Surveys for the salamander are known to have a very low detection rate for occupied areas and DOE has assumed that all AEIs at LANL are occupied at all times by the salamander.

Within the Site Plan, DOE has assessed activities that could cause habitat alteration and includes any action that alters the soil structure, vegetative components necessary to the species, water quality, or hydrology in undeveloped areas of an AEI. If an activity were to take place outside of the AEI the activity will be assessed if it will have effects inside the AEI core. Within the core areas, only activities specified within the Site Plan and those that have no effect in the core areas (e.g. no habitat alterations or effects within the core areas) will be conducted without further consultation with the Service. Habitat alterations also include soil pits for soil samples deeper than 6 inches (15.2 centimeters) using either hand or mechanized augers. Within the Site Plan, DOE is proposing fuels management practices to reduce wildfire risk and maintenance of utility corridors within the AEIs. The likelihood that salamanders may be affected by the actions in the Site Plan is very low. To ensure that effects to the salamander are insignificant and discountable, the Site Plan incorporates the following conservation measures as restrictions to the identified work:

### Fuels Management Practices to Reduce Wildfire Risk

- a. Within undeveloped core areas, thinning trees to a level of 80% canopy cover or higher may occur; tree thinning below 80% canopy cover is not part of the action under this consultation.
- b. Large logs on the ground will be left in place and not chipped.
- c. Large trees that are felled will be left as large logs on the ground
- d. When appropriate, smaller trees and understory shrubs that may be thinned will be dispersed and left on-site to aid in soil moisture retention.
- e. In buffer areas, thinning of trees may occur to the current LANL-approved prescription level; clear-cutting will not occur.
- f. Thinning activities will not occur during the rainy season when salamanders are surface active, between July 1 October 31. Thinning activities may occur earlier in October if freezing temperatures are present.
- g. In the unlikely event that a salamander is observed surface active during thinning activities, all activities shall cease, and the Service will be notified.

### **Utility Corridors**

- a. Cutting trees that threaten power lines may occur within 26 feet (8 meters) of either side of an existing utility line at LANL
- b. New utility lines and utility lines requiring clearance of a right-of-way greater than 52 feet (16 meters) total in core habitat is not part of the action under this consultation.

Habitat alterations other than the fuels management practices and utility corridor maintenance described above will not occur in undeveloped core areas under the guidelines of the Site Plan or this consultation. The Service concurs with DOE's determination regarding the salamander for the following reasons:

Within the Site Plan, DOE has placed the above detailed restrictions to ensure that any effects to the salamander and its habitat remain insignificant and discountable. Canopy cover will remain at 80% or greater in undeveloped core areas and fire management actions will occur outside of the salamander surface activity period. Maintaining utility line corridors in areas with existing infrastructure (the utility lines) by removing individual hazard trees is not expected to have any measurable effect on salamanders or their potential habitat. Consequently, we concur that potential effects to the salamander from the proposed action will be insignificant and discountable.

This concludes section 7 consultation regarding the proposed action. If monitoring or other information results in modification or the inability to complete all aspects of the proposed action, consultation should be reinitiated. Please contact the Service if: 1) future surveys detect listed, proposed or candidate species in habitats where they have not been previously observed; 2) the proposed action changes or new information reveals effects of the proposal to listed species that have not been considered in this analysis; or 3) a new species is listed or critical habitat designated that may be affected by the action.

Thank you for your concern for endangered and threatened species and New Mexico's wildlife habitats. In future correspondence regarding this project, please refer to consultation #02ENNM00-2014-I-0014. If you have any questions, please contact Michelle Christman of my staff at (505) 761-4715.

Sincerely,

Wally Murphy
Field Supervisor

cc:

Wildlife Biologist, Cuba Ranger District, Cuba, NM (Attn: Ramon Borrego) Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico



## United States Department of the Interior



### FISH AND WILDLIFE SERVICE

New Mexico Ecological Services Field Office 2105 Osuna Road NE Albuquerque, New Mexico 87113 Telephone 505-346-2525 Fax 505-346-2542 www.fws.gov/southwest/es/newmexico/

August 6, 2015

Cons. # 02ENNM00-2015-I-0538

Kimberly Davis Lebak, Manager Department of Energy National Nuclear Security Administration Los Alamos Field Office Los Alamos, New Mexico 87544

Dear Ms. Lebak:

This responds to your July 9, 2015, cover letter and biological assessment (BA) requesting informal consultation for the addition of the Western distinct population segment of the yellow-billed cuckoo (*Coccyzus americanus occidentalis*) (cuckoo) and the New Mexico meadow jumping mouse (*Zapus hudsonius luteus*) (jumping mouse) to the Los Alamos National Laboratory Habitat Management Plan, Los Alamos, New Mexico. As documented in your BA, which is hereby incorporated by reference, we find that your proposed action will have insignificant and discountable effects to the cuckoo and the jumping mouse. Therefore, the Service concurs with your determination of "may affect, is not likely to adversely affect" for the cuckoo and the jumping mouse.

This concludes section 7 consultation regarding the proposed action. If monitoring or other information results in modification or the inability to complete all aspects of the proposed action, consultation should be reinitiated. Please contact the Service if: 1) future surveys detect listed, proposed or candidate species in habitats where they have not been previously observed; 2) the proposed action changes or new information reveals effects of the proposal to listed species that have not been considered in this analysis; or 3) a new species is listed or critical habitat designated that may be affected by the action.

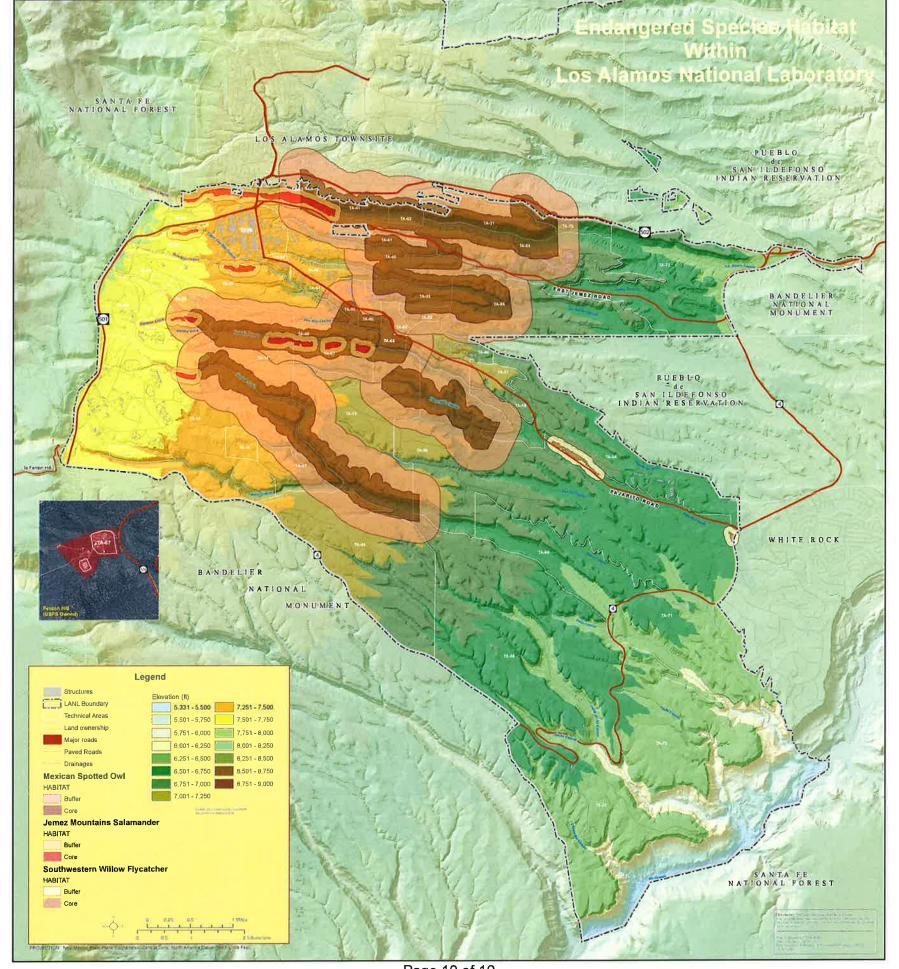
Thank you for your concern for endangered species and New Mexico's wildlife habitats. If you have any questions, please contact Eric Hein of my staff at the letterhead address or at (505) 761-4735.

Sincerely,

for Wally Murphy Field Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico





## U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) EPA's NPDES EREPORTING HELP DESK



Triad National Security LLC ATTN: Enrique Torres PO Box 1663, MS K490 Los Alamos, NM 87545

Facility: Los Alamos National Laboratory PO Box 1663 Los Alamos, NM 87545

NPDES ID: NMR050013

Dear Enrique Torres:

This letter acknowledges that you have submitted a complete Multi Sector General Permit (MSGP) Notice of Intent (NOI) Modification form. It has been processed and the information you provided has been updated in EPA's database.

If you have other questions concerning the stormwater program, please contact EPA Region 6:

Name: Nasim Jahan Phone: (214) 665-7522

Email: Jahan.Nasim@epa.gov

If you have any questions regarding this letter, please call the EPA NPDES eReporting Help Desk at 1-877-227-8965 (toll free) or send an email to NPDESeReporting@epa.gov.

EPA NPDES eReporting Help Desk Operated by Avanti Corporation 1200 Pennsylvania Ave., NW Mail Code: 4203M Washington, DC 20460 1-877-227-8965



**Environmental Protection and Compliance** 

Los Alamos National Laboratory PO Box 1663, K491 Los Alamos, NM 87545 (505) 667-2211

Date: JUN 1 1 2019

Symbol: EPC-DO: 19-191

LA-UR: 19-25199

Stormwater Notice Processing Center William Jefferson Clinton East Building – Room 7420 ATTN: 2015 MSGP Signature Agreement U.S. Environmental Protection Agency 1201 Constitution Avenue, NW Washington, DC 20004

Subject: National Pollutant Discharge Elimination System (NPDES) Permit Tracking No.

NMR050013, Multi-Sector General Permit (MSGP) Change Notice of Intent

(Change NOI) Reporting Pursuant to Part 7.4

To Whom It May Concern:

This letter serves to submit Change NOI information to modify outfalls and monitoring requirements related to MSGP Permit Tracking No. NMR050013 for Triad National Security, LLC (Triad) as the operator for Los Alamos National Laboratory pursuant to Part 7.4 of the MSGP.

Environmental Protection Agency's (EPA's) Electronic Reporting Rule requires that NOIs be submitted using the NeT-MSGP program service on the EPA Central Data Exchange system. However, due to system limitations previously identified by Triad and verified with EPA Region 6 personnel, a complete and accurate NOI could not be created in NeT-MSGP. Therefore, change NOI information cannot be submitted using NeT-MSGP (Attachment 1). As a result, Triad was granted a waiver to submit paper NOI forms from Nasim Jahan (EPA Region 6) on September 26, 2018 (Attachment 1).

Part 6.2.4.1 of the MSGP indicates no monitoring is required when a waterbody's impairment is related to a non-pollutant. EPA Region 6 has concurred that temperature is a non-pollutant, therefore monitoring for temperature in stormwater as an impairment is not required (Attachment 2).

To accurately update the NOI and to facilitate complete and accurate information in NetDMR, Triad is submitting a paper NOI on EPA Form 3510-6 (Attachment 3) and an additional table defining



EPC-DO: 19-191

Stormwater Notice Processing Center

modifications to the monitored outfall-specific Sector and impaired waters limits sets (Attachment 4) currently populated in the NetDMR system.

Your assistance is greatly appreciated as Triad is committed to maintaining compliance with the MSGP requirements. If you have any questions, please contact Terrill Lemke (505) 665-2397 or Leslie Dale (505) 606-2371.

Very Truly Yours,

**Enrique Torres Division Leader** 

Environmental Protection & Compliance Division

ET/TWL/LJD:jdm

Attachment(s): Attachment 1 EPA Region 6 Approval for Triad National Security, LLC to Submit a Paper NOI; EPA Guidance to Submit Change NOI Information via EPA Form

Attachment 2 EPA Region 6 Concurrence Regarding Temperature as a Non-

Pollutant

Attachment 3 Change NOI for Stormwater Discharges Associated with Industrial

Activity under the NPDES Multi-Sector General Permit

Attachment 4 NetDMR Monitoring Requirements for Los Alamos National Laboratory, Operated by Triad National Security, LLC, MSGP ID NMR050013

Copy: Nasim Jahan, EPA Region 6, jahan.nasim@epa.gov, (E-File)

Helen Nguyen, EPA Region 6, nguyen.helen@epa.gov, (E-File)

Sarah Holcomb, NMED/SWQB, sarah.holcomb@state.nm.us, (E-File)

Karen E. Armijo, NA-LA, karen.armijo@nnsa.doe.gov, (E-File)

Michael W. Hazen, ALDESHQSS, mhazen@lanl.gov, (E-File)

William R. Mairson, ALDESHQSS, wrmairson@lanl.gov, (E-File)

Timothy A. Dolan, GC-ESH, tdolan@lanl.gov, (E-File)

Taunia S. Van Valkenburg, EPC-CP, tauniav@lanl.gov, (E-File)

Terrill. W. Lemke, EPC-CP, tlemke@lanl.gov, (E-File)

Holly L. Wheeler, EPC-CP, hbenson@lanl.gov, (E-File)

Leslie J. Dale, EPC-CP, leslie@lanl.gov, (E-File)

adesh-records@lanl.gov, (E-File)

lasomailbox@nnsa.doe.gov, (E-file)

epccorrespondence@lanl.gov, (E-File)



## Attachment 1

EPA Region 6 Approval for Triad National Security, LLC to Submit a Paper NOI; EPA Guidance to Submit Change NOI Information via EPA Form 3510-6

EPC-DO: 19-191

LA-UR-19-25199

Date:	JUN 1 1 2019	
Date		

### Dale, Leslie J

From: Lemke, Terrill W

Sent: Wednesday, September 26, 2018 4:16 PM

**To:** Dolan, Timothy Aloysius; Dale, Leslie J; Wheeler, Holly Lynn

**Subject:** FW: Request for LANL Paper MSGP NOI Waiver

Follow Up Flag: Follow up Flag Status: Flagged

FY

Terrill Lemke, PE, CPESC, CISEC Environmental Compliance Programs Los Alamos National Laboratory Los Alamos, NM

Office: 505-665-2397 Cell: 505-699-0725

From: Jahan, Nasim < Jahan. Nasim@epa.gov>
Sent: Wednesday, September 26, 2018 2:43 PM

To: Lemke, Terrill W <tlemke@lanl.gov>

Cc: Emily Gorman <emily@avanticorporation.com>
Subject: RE: Request for LANL Paper MSGP NOI Waiver

Dear Mr. Terrill:

EPA, Region 6 is approving your request for paper submission as the facility is unable to submit the NOI online.. Please mail the hardcopies to the following address:

#### For Regular U.S. Mail Delivery:

Stormwater Notice Processing Center
Mail Code 4203M, ATTN: 2015 MSGP Signature Agreement
U.S. EPA
1200 Pennsylvania Avenue, NW
Washington, DC 20460

### For Overnight/Express U.S. Mail Delivery:

Stormwater Notice Processing Center
William Jefferson Clinton East Building – Room 7420
ATTN: 2015 MSGP Signature Agreement
U.S. EPA
1201 Constitution Avenue, NW
Washington, DC 20004

Thank you,

Nasim Jahan

EPC-DO: 19-191
Environmental Engineer
Permits and Technical Section (6WQ-PP)
EPA Region 6 Water Quality Protection Division
1445 Ross Avenue, Ste. 1200
Dallas, TX 75202-2733

Phone: 214.665.7522 Fax: 214.665.2191

From: Lemke, Terrill W [mailto:tlemke@lanl.gov]
Sent: Wednesday, September 26, 2018 3:30 PM
To: Jahan, Nasim < Jahan. Nasim@epa.gov>

Cc: Dale, Leslie J < leslie@lanl.gov>; Dolan, Timothy Aloysius < tdolan@lanl.gov>

Subject: Request for LANL Paper MSGP NOI Waiver

Nasim,

Thank you for speaking with us today. We've had the opportunity to review the changes implemented in the updated NeT-MSGP system that rolled out earlier this year, and have identified the following issues as problematic for submitting an accurate and complete electronic NOI.

A new NOI must be submitted for Triad National Security, LLC (Triad) as a new operator for Los Alamos National Laboratory (LANL) pursuant to Part B.12.C of the 2015 MSGP. Triad is replacing Los Alamos National Security, LLC (LANS) as operator of LANL effective November 1, 2018. Per the schedule in Table 1-2 of the MSGP, Triad's NOI must be submitted by October 2, 2018.

EPA's Electronic Reporting Rule requires that NOIs be submitted using the NeT-MSGP program service on the EPA Central Data Exchange system. However, due to the following system limitations previously identified by LANS and coordinated by EPA Region 6 personnel, a complete and accurate NOI cannot be submitted using NeT-MSGP.

- Part 9.6.2 of the 2015 MSGP, Permit Conditions for the State of New Mexico, requires that benchmark values be modified to reflect New Mexico water quality standards for facilities in New Mexico, based on benchmark values from the Standards for Interstate and Intrastate Surface Waters (20.6.4.900 New Mexico Administrative Code [NMAC]). These modified benchmark values are not recognized by NeT-MSGP and populated in NetDMR.
- 2. The 2018-2020 State of New Mexico Clean Water Act §303(d)/ §305(b) Integrated Report requires monitoring of impaired waters pollutants not available for selection in NeT-MSGP (e.g., Adjusted Gross Alpha and Temperature).
- 3. 20.6.4.900 NMAC requires monitoring of certain modified benchmark and impaired waters metals pollutants as dissolved species, which are not available for selection in NeT-MSGP. Currently, only total metals species may be assigned in NeT-MSGP.
- 4. Due to extended frozen conditions during the winter and a semi-arid climate, Triad will implement an alternative monitoring period of four (4) two-month monitoring quarters for benchmark values as identified below, in accordance with Part 6.1.6 of the 2015 MSGP. This alternate monitoring schedule does not coincide with the default four (4) three-month quarters listed in Part 6.1.7 of the 2015 MSGP and NeT-MSGP does not allow input of an alternate monitoring schedule. Accordingly, annual impaired waters and Effluent Limitation Guideline monitoring will be conducted between April 1 and November 30 of each year.

April 1 through May 31
June 1 through July 31
August 1 through September 30

October 1 through November 30

These system limitations directly result in inaccurate pollutants, limits, monitoring periods and DMR due dates being populated in NetDMR.

EPA Region 6 has recognized the challenges that the outgoing operator (LANS) has identified with NeT-MSGP related to compliance with Part 9.6.2 of the 2015 MSGP, Permit Conditions for the State of New Mexico, and has been instrumental in helping LANS to resolve these issues. Therefore, per your verbal direction, we are requesting a waiver for Triad to submit a paper NOI in lieu of submitting an inaccurate and incomplete NOI in NeT-MSGP. Please advise at your earliest convenience if you concur with our submittal of a paper NOI, as we must submit by Oct 2.

We appreciate your assistance in helping us maintain compliance. If you have any questions, please contact me at (505) 665-2397.

Terrill

Terrill Lemke, PE, CPESC, CISEC Environmental Compliance Programs Los Alamos National Laboratory Los Alamos, NM Office: 505-665-2397

Cell: 505-699-0725

From:

Emily Hack (Avanti) (EPA NeT Support)

Cc: Subject: Jahan Nasim; Wheeler, Holly Lynn; Dale, Leslie J; Hazen, Michael W NMR050013 - Triad National Security LLC - MSGP Notice of Intent

Date:

Friday, October 26, 2018 11:13:07 AM

Attachments:

NMR050013 Triad Los Alamos National Laboratory 2015 MSGP NOI Acknowledgement.pdf

Triad National Security LLC Los Alamos National Laboratory 10-02-2018.pdf

For Brach (Abo Anni ned) Sparie (on Minister

You are CC'ed on this support request (10066). Reply to this email to add a comment to the request.

Emily Hack (Avanti) (EPA NeT Support)

Day 25, 13012 EDT

Good afternoon,

The paper Notice of Intent (NOI) submitted under EPA's Multi-Sector General Permit (MSGP) for Los Alamos National Laboratory under Triad National Security LLC has been processed by the EPA NPDES eReporting Help Desk. The facility was assigned NPDES ID NMR050013. Please, retain the attached acknowledgement letter for your records.

Due to the unique nature of the outfall sequence and monitoring requirements, EPA instructed that we enter the NOI directly into the back-end system. Therefore, the NOI will not be generated in the NeT MSGP program at this time. Attached is the NOI that we received. As I'm sure you are aware, for any changes to the NOI in the future, please submit them via paper as well.

Please, let me know if you have any questions.

Sincerely,

Emily Hack
NPDES eReporting Help Desk
Staffed by Avanti Corporation
1-877-227-8965
NPDESeReporting@epa.gov

# **Attachment 2**

EPA Region 6 Concurrence Regarding Temperature as a Non-Pollutant

EPC-DO: 19-191

LA-UR-19-25199

Date:	JUN 1 1 2019	

### Dale, Leslie J

From: Jahan, Nasim < Jahan.Nasim@epa.gov>
Sent: Wednesday, March 27, 2019 10:40 AM

To: Dale, Leslie J

Cc: Lemke, Terrill W; Dolan, Timothy Aloysius; Wheeler, Holly Lynn; Holcomb, Sarah,

**NMENV** 

**Subject:** RE: Temperature Monitoring for MSGP

Dear Leslie:

I concur your decision based on your reference. Please let me know if you have any other concerns..

Thank you,

Nasim..

From: Dale, Leslie J < leslie@lanl.gov>

Sent: Wednesday, March 27, 2019 11:16 AM To: Jahan, Nasim < Jahan. Nasim@epa.gov>

Cc: Lemke, Terrill W <tlemke@lanl.gov>; Dolan, Timothy Aloysius <tdolan@lanl.gov>; Wheeler, Holly Lynn

<hbenson@lanl.gov>; Holcomb, Sarah, NMENV <sarah.holcomb@state.nm.us>

Subject: Temperature Monitoring for MSGP

Good Morning Nasim,

We (Los Alamos National Laboratory, NMR0050013) have a question regarding whether temperature is considered a pollutant with respect to impaired waters monitoring under the MSGP. Part 6.2.4.1 of the MSGP, paragraph 2 states "No monitoring is required when a waterbody's biological communities are impaired but no pollutant, including indicator or surrogate pollutants, is specified as causing the impaired, or when a waterbody's impairment is related to hydrologic modifications, impaired hydrology, or other non-pollutant."

For context, the 2018-2020 State of New Mexico CWA Section 303(d)/Section 305(b) Integrated Report listed temperature as an impairment to Sandia Canyon (Sigma Canyon to NPDES outfall 001, AU ID: NM-9000.A\_047). Upon release of the revised Integrated Report, we included temperature as an impairment in our NOI submitted under Triad National Security, LLC (the new operator of Los Alamos National Laboratory) effective November 1, 2018.

We sought clarification from the New Mexico Environment Department – Surface Water Quality Bureau on March 25, 2019. Upon visiting the language in Part 6.2.4.1 of the MSGP, Sarah Holcomb provided guidance that temperature is a non-pollutant.

According to 40 CFR 122.2, Pollutant means dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials (except those regulated under the Atomic Energy Act of 1954, as amended (42 U.S.C. 2011 et seq.)), heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water. It does not mean:

(a) Sewage from vessels; or

(b) Water, gas, or other material which is injected into a well to facilitate production of oil or gas, or water derived in association with oil and gas production and disposed of in a well, if the well used either to facilitate production or for

disposal purposes is approved by authority of the State in which the well is located, and if the State determines that the injection or disposal will not result in the degradation of ground or surface water resources.

We interpret "heat" to mean heat generated by MSGP industrial activities and not ambient temperature associated with stormwater runoff from MSGP facilities, and therefore believe that monitoring for temperature in stormwater as an impairment is not required.

Please let us know whether you concur, as we are preparing to modify our NOI to remove temperature from our monitoring requirements for the 2019 monitoring season.

Thank you,
Leslie Dale, CHMM
Environmental Compliance Programs (EPC-CP)
Los Alamos National Laboratory
PO Box 1663, MS K490
Los Alamos, NM 87545
(505) 606-2371

## **Attachment 3**

Change NOI for Stormwater Discharges Associated with Industrial Activity under the NPDES Multi-Sector General Permit

EPC-DO: 19-191

LA-UR-19-25199

Date:	JUN 1 1 2019	

NPDES FORM 3510-6



# United States Environmental Protection Agency Washington, DC 20460

NOTICE OF INTENT (NOI) FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMIT

Form Approved, OMB No. 2040-0004

Submission of this Notice of Intent (NOI) constitutes notice that the operator identified in Section C of this form requests authorization to discharge pursuant to the NPDES Stormwater Multi-Sector General Permit (MSGP) permit number identified in Section B of this form. Submission of this NOI also constitutes notice that the operator identified in Section C of this form meets the eligibility conditions of Part 1.1 of the MSGP for the facility identified in Section D of this form. To obtain authorization, you must submit a complete and accurate NOI form. Discharges are not authorized if your NOI is incomplete or inaccurate or if you were never eliaible for permit coverage. Refer to the instructions at the end of this form to complete your NOI.

never eligible for permit coverage. Refer to the instructions of the end of this form to complete your NOI.	_
A. Approval to Use Paper NOI Form	
1, Have you been granted a waiver from electronic reporting from the EPA Regional Office*? VES NO	
If yes, check which waiver you have been granted, the name of the EPA Regional Office staff person who granted the waiver, and the date of approva	:
Waiver granted: The owner/operator's headquarters is physically located in a geographic area (i.e., ZIP code or census tract) that is identifie as under-served for broadband Internet access in the most recent report from the Federal Communications Commission.	d
The owner/operator has issues regarding available computer access or computer capability.	
Name of EPA staff person that granted the waiver: Nasim Jahan	
Date approval obtained: $09/26/2018$ Note: This form is submitting Change NOI information. Modified items/sections are highlighted.	
<ul> <li>Note: You are required to obtain approval from the applicable EPA Regional Office prior to using this paper NOI form. If you have not obtained a waiver, you must file this form electronically using the NPDES eReporting Tool (NeT) at <a href="http://water.epa.gov/polwaste/npdes/stormwater/Stormwater-eNOI-System-for-EPAs-MultiSector-General-Permit.cfm">http://water.epa.gov/polwaste/npdes/stormwater/Stormwater-eNOI-System-for-EPAs-MultiSector-General-Permit.cfm</a></li> </ul>	υc
B. Permit Information NPDES ID (EPA Use Only): NMR 0 5 0 0 13	3
(see Appendix C of the MSGP for the list of eligible master permit numbers)	
2. Are you a new discharger or a new source as defined in Appendix A? 🗌 YES 👚 NO (If yes, skip to Part C of this form).	
3. If you are not a new discharger or a new source, have stormwater discharges from your facility been covered previously under an NPDES permit?	
If yes, provide the NPDES ID if you had coverage under EPA's 2008 MSGP or the NPDES ID if you had coverage under an EPA individual permit:	
C. Facility Operator Information	Y
1. Operator Information:	
Operator Name:	
Mailing Address:	
Street:	
City: State: ZIP Code:	
County or Similar Government Subdivision;	
Phone: Ext.	
E-mail:	
2. Operator Point of Contact Information:	
First Name, Middle Initial, Last Name:	
Title:	
3, NOI Preparer Information (Complete if NOI was prepared by someone other than the certifier):	
First Name, Middle Initial, Last Name:	
Organization:	
Phone: Ext	
E-mail:	

D. Facility Information				
1. Facility Name:				
2, Facility Address;				
Street/Location:				
City: State: ZIP Code:				
County or Similar Government Subdivision;				
3. Latitude/Longitude for the facility:				
Latitude:° N (decimal degrees) Longitude;, W (decimal degrees)				
Latitude/Longitude Data Source: Map GPS Other				
If you used a USGS topographic map, what was the scale?				
Horizontal Reference Datum: NAD 27 NAD 83 WGS 84				
4, Is your facility located on Indian Country lands?				
If yes, provide the name of the Indian tribe associated with the area of Indian country (including name of Indian reservation, if applicable);				
5, Are you requesting coverage under this NOI as a "federal operator" as defined in Appendix A? 🔲 YES 🔲 NO				
6. What is the ownership type of the facility?				
☐ Corporation ☐ State Government ☐ Tribal Government ☐ School District				
District   Mixed Ownership (e.g.   Municipal or Water   District				
7. Estimated area of industrial activity at your facility exposed to stormwater: 51 (to the nearest quarter acre)				
8, Sector-Specific Information				
Identify the 4-digit Standard Industrial Classification (SIC) code or 2-letter Activity Code that best represents the products produced or services rendered for which your facility is primarily engaged, as defined in the MSGP, and the applicable sector and subsector of your primary industrial activity (See Appendix D);				
Primary SIC Code: OR Primary Activity Code:				
Sector: Subsector: Note: REMOVE the following Sector/Subsector from permit coverage.				
Identify the applicable sector(s) and subsector(s) of any co-located industrial activity for which you are requesting permit coverage:				
Sector: F Subsector: F Subsector: Subsector: Subsector: Subsector:				
Sector: Subsector: Sub				
If you are a Sector S (Air Transportation) facility, do you anticipate using more than 100,000 gallons of pure glycol in glycol-based deicing fluids and/or 100 tons or more of urea on an average annual basis?				
lf you are a Sector G (Metal Mining) facility, do you have discharges from waste rock and overburden piles? 🔲 YES 🔲 NO				
Check the type of ore you mine at your facility: 🔲 Tungsten Ore 🔲 Nickel Ore 🔲 Aluminum Ore				
□ Mercury Ore □ Iron Ore □ Platinum Ore □ Titanium Ore □ Vanadium Ore □ Molybdenum □ Uranium, Radium, and/or Vanadium Ore				
9, Is your facility presently inactive and unstaffed?* TES NO				
* Note that if your facility becomes inactive and unstaffed during the permit term, you must submit an NOI modification to reflect the change.				
E. Discharge Information				
1. By indicating "Yes" below, I confirm that I understand that the MSGP only authorizes the allowable stormwater discharges in Part 1.1.2 and the allowable non-stormwater discharges listed in Part 1.1.3. Any discharges not expressly authorized in this permit cannot become authorized or shielded from liability under CWA section 402(k) by disclosure to EPA, state, or local authorities after issuance of this permit via any means, including the Notice of Intent (NOI) to be covered by the permit, the Stormwater Pollution Prevention Plan (SWPPP), during an inspection, etc. If any discharges requiring NPDES permit coverage other than the allowable stormwater and non-stormwater discharges listed in Parts 1.1.2 and 1.1.3 will be discharged, they must be covered under another NPDES permit.    TYES				
2, Federal Effluent Limitation Guidelines				
Are you requesting permit coverage for any stormwater discharges subject to effluent limitation guidelines? 🔲 YES 🔲 NO				

40 CFR Part/Subpart	Eligible Discharges	Affected MSGP Sector	New Source Date	Check if Applicable
Part 411, Subpart C	Runoff from material storage piles at cement manufacturing facilities	Е	2/20/1974	
Part 418 Subpart A	Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished product, by-products or waste products (SIC 2874)	С	4/8/1974	п
Part 423	Coal pile runoff at steam electric generating facilities	0	11/19/1982 10/8/1974 <sup>1</sup>	0
Part 429, Subpart I	Discharges resulting from spray down or intentional wetting of logs at wet deck storage areas	A	1/26/1981	
Part 436, Subpart B, C, or D	Mine dewatering discharges at crushed stone mines, construction sand and gravel mines, or industrial sand mines	J	N/A	
Part 443, Subpart A	Runoff from asphalt emulsion facilities	D	7/28/1975	
Part 445, Subparts A & B	Runoff from hazardous waste and non-hazardous waste landfills	K, L	2/2/2000	
Part 449	Runoff containing urea from airfield pavement deicing at existing and new primary airports with 1,000 or more annual non-propeller aircraft departures	s	6/15/2012	

'NSPS promulgated in 1974 were not removed via the 1982 regulation; therefore wastewaters generated by Part 423-applicable sources that were New Sources under the 1974 regulations are subject to the 1974 NSPS.

#### 3. Receiving Waters Information: (Attach a separate list if necessary)

List all of the stormwater outfalls from your facility. Each outfall must be identified by a unique 3-digit ID (e.g., 001, 002). Also provide the latitude and longitude in degrees decimal for each outfall.		For each outfall, provide the following receiving water information:		
		Provide the name of the first water of the U.S. that receives stormwater directly from the outfall and/or from the MS4 that the outfall discharges to:	If the receiving water is impaired (on the CWA 303(d) list), list the pollutants that are causing the impairment:	If a TMDL been completed for this receiving waterbody, providing the following information:
Ouffall ID	002 (Sector AA, Subsector AA1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)		TMDL Name and ID:
Latitude		Remove monitored outfall 002 from permit coverage and NetDMR. Outfall was eliminated effective May 1, 2019.		Pollutant(s) for which there is a TMDL:
Longitude				N/A
Outfall ID	005 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg. centrigrade from list of impairments	TMDL Name and ID:
Latitude				Pollutant(s) for which there is a TMDL:
Longitude				N/A
If substantia	ally identical to other o	I utfall, list identical outfall ID:	_	L

Outfall ID	006 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID: N/A
Latitude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude				IVA
If <mark>substantic</mark>	ally identical to other o	outfall, list identical outfall ID: 005	<u> </u>	
Outfall ID	009 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID: N/A
Latitude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude				
If substantic	ally identical to other c	outfall, list identical outfall ID:		
Outfall ID	007 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID:
Latitude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude				1,47,4
lf <mark>substanti</mark> a	ı <mark>lly identical</mark> to other o	utfall, list identical outfall ID: 009		
Outfall ID	008 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID: N/A
Latitude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude				

Outfall ID	010 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID:
Latitude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude				IN/A
If <mark>substanti</mark>	ally identical to other o	utfall, list identical outfall ID: 009		
Outfall ID	012 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID: N/A
Latitude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude				
If substantic	ally identical to other o	utfall, list identical outfall ID:		
Outfall ID	011 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID:
Latitude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude				
	•		4	
If <mark>substantic</mark>	ılly identical to other o	<mark>utfall,</mark> list identical outfall ID: <u>012</u>		
lf <mark>substantic</mark> Outfall ID	017 (Sectors AA, F Subsectors AA1, F4)	Sandia Canyon (Sigma Canyon to NPDES outfall		TMDL Name and ID:
	017 (Sectors AA, F	Sandia Canyon (Sigma		

Outfall ID	013 (Sectors AA, F Subsectors AA1, F4)	Mortandad Canyon (Within LANL)	TMDL Name and ID:
Latitude		Remove SIO 013 from permit	Pollutant(s) for which there is a TMDL:
Longitude		coverage. Site achieved No Exposure Status effective December 18, 2018.	N/A
If <mark>substant</mark>	ally identical to other o	u <mark>tfall,</mark> list identical outfall ID: 017	
Outfall ID	014 (Sectors AA, F Subsectors AA1, F4)	Mortandad Canyon (Within LANL)	TMDL Name and ID: N/A
Latitude		Remove SIO 014 from permit	Pollutant(s) for which there is a TMDL:
Longitude		coverage. Site achieved No Exposure Status effective December 18, 2018.	N/A
lf <mark>substanti</mark>	<mark>ally identical</mark> to other o	u <mark>tfall,</mark> list identical outfall ID: <u>017</u>	
Ouffall ID	015 (Sectors AA, F Subsectors AA1, F4)	Mortandad Canyon (Within LANL)	TMDL Name and ID:
Latitude		Damagua CIO 015 firana na mait	Pollutant(s) for which there is a TMDL:
Longitude		Remove SIO 015 from permit coverage. Site achieved No Exposure Status effective December 18, 2018.	N/A
		017	
lf <mark>substanti</mark>	<mark>ally identical</mark> to other ou	u <mark>tfall,</mark> list identical outfall ID: 017	
lf <mark>substanti</mark> Outfall ID	016 (Sectors AA, F Subsectors AA1, F4)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	TMDL Name and ID:
	016 (Sectors AA, F	Sandia Canyon (Sigma Canyon to NPDES outfall	personal and the second second second

Outfall ID	019 (Sectors AA, F Subsectors AA1, F4)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)		TMDL Name and ID:
Latitude		Remove SIO 019 from permit		Pollutant(s) for which there is a TMDL:
Longitude		coverage. Site achieved No Exposure Status effective December 18, 2018.		N/A
If <mark>substantic</mark>	a <mark>lly identical</mark> to other o	utfall, list identical outfall ID: 017		·
Ouffall ID	020 (Sectors AA, F Subsectors AA1, F4)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)		TMDL Name and ID: N/A
Latitude		Remove monitored outfall 020 from permit coverage and		Pollutant(s) for which there is a TMDL:
Longitude		NetDMR. Site achieved no Exposure Status effective December 18, 2018.		IN/A
lf substantic	ally identical to other o	utfall, list identical outfall ID:		•
Outfall ID	022 (Sectors AA, P, Subsectors AA1, P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID:
Latitude		,	centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude		Add Sector AA, Subsector AA1 to permit coverage for monitored outfall 022.		N/A
f substantic	ally identical to other or	utfall, list identical outfall ID:	···	
Outfall ID	021 (Sector AA, P, Subsector AA1, P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID:
.atitude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
.ongitude		Add Sector AA, Subsector AA1 to permit coverage for SIO 021.		N/A

Outfall ID	023 (Sector AA, P, Subsector AA1, P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg. centrigrade from	TMDL Name and ID:
Latitude			list of impairments	Pollutant(s) for which there is a TMDL:
Longitude		Add Sector AA, Subsector AA1 to permit coverage for SIO 023.		N/A
lf <mark>substanti</mark> c	ally identical to other o	utfall, list identical outfall ID: 022		
Ouffall ID	024 (Sector AA, P, Subsector AA1, P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg. centrigrade from	TMDL Name and ID:
Latitude			list of impairments	Pollutant(s) for which there is a TMDL:
Longitude		Add Sector AA, Subsector AA1 to permit coverage for SIO 024.		N/A
lf <mark>substantic</mark>	ı <mark>lly identical</mark> to other o	utfall, list identical outfall ID: 022		
Outfall ID	025 (Sector AA, P, Subsector AA, P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID:
Latitude		.,	centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude		Add Sector AA, Subsector AA1 to permit coverage for SIO 025.		N/A
lf <mark>substantic</mark>	<mark>ılly identical</mark> to other ou	utfall, list identical outfall ID: 022	**************************************	
Outfall ID	026 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID:
Latitude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude				

Outfall ID	027 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID:
Latitude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude				IN/A
If <mark>substanti</mark>	ally identical to other	outfall, list identical outfall ID: 026		*
Outfall ID	028 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID: N/A
Latitude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude				
If <mark>substantic</mark>	ally identical to other	outfall, list identical outfall ID: 026		,,,
Outfall ID	029 (Sector N, Subsector N2)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID:
		7/	centrigrade from	B-B-t-W-M-M-M-M-
Latitude			list of impairments	Pollutant(s) for which there is a TMDL:
			list of impairments	
Longitude	ally identical to other	outfall, list identical outfall ID:	list of impairments	there is a TMDL:
Longitude	032 (Sector P, Subsector P1)	outfall, list identical outfall ID:  Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	there is a TMDL:
Longitude If substantic	032 (Sector P,	Sandia Canyon (Sigma Canyon to NPDES outfall	Remove 00010 Temperature,	there is a TMDL: N/A  TMDL Name and ID:
Longitude If substantic	032 (Sector P,	Sandia Canyon (Sigma Canyon to NPDES outfall	Remove 00010 Temperature, water deg. centrigrade from	there is a TMDL: N/A  TMDL Name and ID: N/A  Pollutant(s) for which there is a TMDL:

Outfall ID	033 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID:
Latitude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude				IWA
If <mark>substanti</mark>	ally identical to other	outfall, list identical outfall ID: 032	*	•
Outfall ID	034 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID: N/A
Latitude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude				
If <mark>substantic</mark>	ally identical to other	o <mark>utfall,</mark> list identical outfall ID: <u>032</u>	2	
If <mark>substantion</mark>	035 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall	Remove 00010 Temperature, water deg.	TMDL Name and ID:
	035 (Sector P,	Sandia Canyon (Sigma	The same of the sa	N/A  Pollutant(s) for which there is a TMDL:
Outfall ID	035 (Sector P,	Sandia Canyon (Sigma Canyon to NPDES outfall	Temperature, water deg. centrigrade from	N/A  Pollutant(s) for which
Outfall ID Latitude Longitude	035 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall	Temperature, water deg. centrigrade from	N/A  Pollutant(s) for which there is a TMDL:
Outfall ID Latitude Longitude	035 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)  outfall, list identical outfall ID: 032  Sandia Canyon (Sigma Canyon to NPDES outfall	Temperature, water deg. centrigrade from	N/A  Pollutant(s) for which there is a TMDL:
Outfall ID  Latitude  Longitude  If substantic	035 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)  outfall, list identical outfall ID: 032  Sandia Canyon (Sigma	Temperature, water deg. centrigrade from	N/A  Pollutant(s) for which there is a TMDL: N/A  TMDL Name and ID:

Outfall ID	037 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID: N/A
Latitude	35.867859		dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs]	Pollutant(s) for which there is a TMDL:
Longitude	-106.292992	Change outfall 037 from SIO to Monitored Outfall effective March 26, 2019.	Remove 00010 Temperature, water deg. centrigrade from list of impairments	N/A
If substantic	ally identical to other	outfall, list identical outfall ID:		**
Outfall ID	039 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID: N/A
Latitude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude				
If substantic	ally identical to other	outfall, list identical outfall ID:		
Outfall ID	038 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall _001)		TMDL Name and ID:
		,		
Latitude		Ramaya SIO 028 from marmit		Pollutant(s) for which there is a TMDL:
Latitude Longitude		Remove SIO 038 from permit coverage. Outfall was eliminated effective April 23, 2019.		
Longitude	ı <mark>lly identical t</mark> o other d	coverage. Outfall was eliminated effective April 23,		there is a TMDL:
Longitude	040 (Sector P, Subsector P1)	coverage. Outfall was eliminated effective April 23, 2019.		there is a TMDL:
Longitude If <mark>substantic</mark>	040 (Sector P,	coverage. Outfall was eliminated effective April 23, 2019.  Doubtfall, list identical outfall ID: 039  Sandia Canyon (Sigma Canyon to NPDES outfall 001)		there is a TMDL: N/A TMDL Name and ID:
Longitude If <mark>substantic</mark> Outfall ID	040 (Sector P,	coverage. Outfall was eliminated effective April 23, 2019.  Doutfall, list identical outfall ID: 039  Sandia Canyon (Sigma Canyon to NPDES outfall		TMDL Name and ID: N/A  Pollutant(s) for which

Outfall ID	042 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg. centrigrade from list of impairments	TMDL Name and ID: N/A  Pollutant(s) for which there is a TMDL:
Longitude				N/A
If substantio	ally identical to other (	outfall, list identical outfall ID:		
Ouffall ID	041, Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID: N/A
Latitude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude				
If <mark>substantic</mark>	ally identical to other o	pu <mark>tfall,</mark> list identical outfall ID: 042		
Outfall ID	074 (Sector A, Subsector A4)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID:
			centrigrade from	Pollutant(s) for which
Latitude		_	list of impairments	there is a TMDL:
Latitude Longitude		_	list of impairments	
Longitude	ılly identical to other o	outfall, list identical outfall ID:	list of impairments	there is a TMDL:
Longitude	073 (Sector A, Subsector A4)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	there is a TMDL:
Longitude If substantic	073 (Sector A,	Sandia Canyon (Sigma Canyon to NPDES outfall	Remove 00010 Temperature,	there is a TMDL: N/A  TMDL Name and ID: N/A  Pollutant(s) for which there is a TMDL:
Longitude If substantic	073 (Sector A,	Sandia Canyon (Sigma Canyon to NPDES outfall	Remove 00010 Temperature, water deg. centrigrade from	there is a TMDL: N/A  TMDL Name and ID: N/A  Pollutant(s) for which

Outfall ID  Latitude  Longitude	075 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg. centrigrade from list of impairments	TMDL Name and ID:  N/A  Pollutant(s) for which there is a TMDL:  N/A
		utfall, list identical outfall ID:		
ir substantic	illy identical to other of	итан, ня ідентсаі очтан ід:	7	
Outfall ID	076 (Sector AA, Subsector A1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper,	TMDL Name and ID:
Latitude	35.8758507	Add new monitored outfall 076	dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs]	Pollutant(s) for which there is a TMDL:
Longitude	-106.327924	to permit coverage and NetDMR. Monitoring began June 1, 2019.	Diplicity is [i Obs]	N/A
If substantic	illy identical to other or	utfall, list identical outfall ID:		
Outfall ID				TMDL Name and ID:
Latitude				Poliutant(s) for which there is a TMDL:
Longitude				
If substantia	lly identical to other ou	utfall, list identical outfall ID:		
Outfall ID				TMDL Name and ID:
Latitude				Pollutant(s) for which there is a TMDL:
Longitude				
If substantia	lly identical to other ou	utfall, list identical outfall ID:		

4, Provide the following Information about your outfall latitude longitude:
Latitude/Longitude Data Source:
Horizontal Reference Datum: NAD 27 NAD 83 WGS 84
5. Does your facility discharge into a Muncipal Separate Storm Sewer System (MS4)? YES NO
If yes, provide the name of the MS4 operator:
6. Check if you discharge to any of the waters of the U.S. that are designated by the state or tribal authority under its antidegradation policy as a Tier 2 (or Tier 2,5) water (water quality exceeds levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water) or as a Tier 3 water (Outstanding National Resource Water)? (See Appendix L).
☐ Tier 2/2,5. Provide the name(s) of receiving water(s):
☐ Tier 3 (Outstanding National Resource Waters)*
* Note: You are ineligible for coverage if you are a new discharger or new source to waters designated as Tier 3 (outstanding national resource waters) for antidegradation purposes under 40 CFR 131.13(a)(3).  7. If you are subject to benchmark monitoring requirements for a hardness-dependent metal, what is the hardness of your receiving water(s) (see Appendix J)?  [mg/L]
8. If you are subject to benchmark monitoring requirements for a hardness-dependent metal, does your facility discharge into any saltwater receiving waters?  YES NO
9. Does your facility discharge to a federal CERCLA site listed in Appendix P? 🔲 YES 👚 NO
lf yes, did you notify the EPA Regional Office in advance of filing your NOI, and did the EPA Regional Office determine that you are eligible for permit coverage pursuant to Part 1.1.4.10*? ☐ YES ☐ NO
Note: If you discharge to a federal CERCLA site listed in Appendix P, you are ineligible for coverage under this permit unless you notify the EPA Regional Office in advance and the EPA Regional Office determines you are eligible coverage under this permit. In determining your eligiblility for coverage under this Parl, the EPA Regional Office may evaluate whether you have included adequate controls and/or procedures to ensure that your discharges will not lead to recontamination of aquatic media at the CERCLA Site such that it will to cause or contribute to an exceedance of a water quality standard.
F. Stormwater Pollution Prevention Plan (SWPPP) Information
1. Has the SWPPP been prepared in advance of filing this NOI, as required?   YES NO
2. SWPPP Contact Information:
First Name, Middle Initial, Last Name;
Professional Title:
Phone: Ext.
E-mail:
3. SWPPP Availability:
Your current SWPPP or certain information from your SWPPP must be made available through one of the following two options. Select one of the options and provide the required information*:
* Note: You are not required to post any confidential business information (CBI) or restricted information (as defined in Appendix A) (such information may be redacted), but you must clearly identify those portions of the SWPPP that are being withheld from public access.
□ <b>Option 1</b> : Maintain a current copy of your SWPPP on an Internet page (Universal Resource Locator or URL).
Provide the web address URL:
Option 2: Provide the following information from your SWPPP:
A. Describe your onsite industrial activities exposed to stormwater (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams), and potential spill and leak areas:

В	, List the pollutant(s) or pollutant constituent(s) associated with each industrial activity exposed to stormwater that could be discharged in stormwater and any authorized non-stormwater discharges listed in Part 1.1,3:
C	C. Describe the control measures you will employ to comply with the non-numeric technology-based effluent limits required in Part 2,1,2 and Part 8, and any other measures taken to comply with the requirements in Part 2,2 Water Quality-Based Effluent Limitations (see Part 5,2,4):
	p. Provide a schedule for good housekeeping and maintenance (see Part 5.2.5.1) and a schedule for all inspections required in Part 4 (see Part 5.2.5.2):
L	E. Endangered Species Protection
1	. Using the instructions in Appendix E of the MSGP, under which endangered species criterion listed in Part 1,1.4,5 are you eligible for coverage under this permit (only check 1 box)?*
	□A □B □C □D □E
*	Note: After you submit your NOI and before your NOI is authorized, EPA may notify you if any additional controls are necessary to ensure your discharges have no likely adverse affects on listed species and critical habitat.
2.	Provide a brief summary of the basis for the criterion selected in Appendix E (e.g., communication with U,S. Fish and Wildlife Service or National Marine Fisheries Service to determine no species in action area; implementation of controls approved by EPA and the Services):
3,	If you select criterion B, provide the NPDES ID from the other operator's NOI authorized under this permit:
4.	If you select criterion C, you must answer the following questions:
	a. What federally-listed species or designated critical habitat are located in your "action area":
	b. Using the Appendix E worksheet, check which of the following is applicable to your facility and answer any corresponding questions:
	☐ I submitted my completed Criterion C Eligibility Form to EPA at least 30 days prior to submitting this NOI and agree to implement any additional measures that were determined by EPA to be necessary to ensure that my discharges and/or discharge-related activities will not have likely adverse affects on listed species and critical habitat.
	Date your Criterion C Eligibilty Form was sent to EPA:
	Describe any EPA-approved measures you will implement to ensure no likely adverse affects on listed species and critical habitat:
	☐ I submitted my completed Criterion C Eligibility Form to EPA at least 30 days prior to submitting this NOI and have not been notified of any additional measures necessary to ensure no likely adverse affects on listed species and critical habitat.
5.	Date your Criterion C Eligibility Form was sent to EPA:///
	Service.

H. Historic Pr	reservation				
1. If your fac	cility is not located o	n Indian country lands, is your facil	ity located on a pro	perty of religious or c	cultural significance to an Indian tribe?
☐ YES	□NO		2		
If yes, pr	ovide the name of the	ne Indian tribe associated with the	properly:		
	instructions in Apper s permit (only check		storic properties pre	eservation criterion list	ed in Part 1.1.4.6 are you eligible for coverage
□ A	В С	D			
i. Certification	on Information		na e		
to assure the system, or th	at qualified personne nose persons directly	I properly gathered and evaluate responsible for gathering the infor	d the information su mation, the informa	ubmitted. Based on m tion submitted is, to tl	r supervision in accordance with a system designed ny inquiry of the person or persons who manage the he best of my knowledge and belief, true, accurate, e possibility of fine and imprisonment for knowing
First Name, h	Middle Initial, Last Na	me: Enrique		Torres	
Title:	Divis	ion Leader		ШШШ	
Signature:	20	~2			Date: 06/11/2019
E-mail:	etorr	es@lanl.gov	ШШ		

# **Attachment 4**

NetDMR Monitoring Requirements for Los Alamos National Laboratory, Operated by Triad National Security, LLC, MSGP ID NMR050013

EPC-DO: 19-191

LA-UR-19-25199

Date:	JUN 1 1 2019

											paired Waters Lim 6.4.900 NMAC [N						
		Permitted			Consolidated Discharge #		Parameter	the NW Water	Quanty Sta	Quality	0.4.500 NIVIAC [N	EW WEXIC	Freg. of	Smpl.	Monitoring Period Start		DMR Due
Permit ID	Facility	Feature	Sector(s)	Subsector	(Limit Set)	Discharge Description	Code	Parameter Name	Symbol	Value	Limit Type	Units	Analysis		Date	Date	Date
NMR050013 L	os Alamos National Laboratory	002	AA	AA1	002-11	11 - Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<b>4=</b>		Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
	os Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<b>4=</b>		Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
With the second	os Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	4=		Maximum	mg/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
Mary Colors of Esperance Colors	os Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01090-1-0	Zinc, dissolved [as Zn]	<b>4=</b>		Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
Andrews and the second second second	os Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable (as Al)	<b>4=</b>	+	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
	os Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<b>&lt;=</b>		Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
	os Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<b>&lt;=</b>		Maximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013 Lo	os Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved (as Zn)	<b>&lt;=</b>		Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
Control of the state of the sta	os Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable (as Al)	<b>4=</b>		Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013 Lo	os Alamos National Laboratory	002	AA	AA1	002-11	11 Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<b>&lt;=</b>		Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
	os Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<b>&lt;=</b>		Maximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
	os Alamos National Laboratory	002	AA	AA1	002-11	11 Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<b>4=</b>		Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
	os Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<b>4=</b>		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
	os Alamos National Laboratory	<del>002</del>	AA	AA1	002-11	11 Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<b>&lt;=</b>		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
	os Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	51450 1 O	Nitrite Plus Nitrate Total	<del>&lt;=</del>		Maximum	mg/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
NMR050013 Lo	os Alamos National Laboratory	002	AA	AA1	002-11	11-Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved (as Zn)	<b>4=</b>		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
POR POZITIVO POR POR PORTO	os Alamos National Laboratory	002	AA	AA1	002-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable (as Al)	<b>←</b>		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
The second secon	os Alamos National Laboratory	002	AA	AA1	002-IW	IW-Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<b>←</b>		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
	os Alamos National Laboratory	002	AA	AA1	002-IW	IW-Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<del>&lt;=</del>		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
	os Alamos National Laboratory	002	AA	AA1	002-IW	IW Impaired Water	00010-1-0	Temperature, water-deg. centigrade	<b>←</b>		Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
Control of the Contro						The control of Performance in the control of the co						2080			1,1,1000	22,00,202	
NMR050013 Lo	os Alamos National Laboratory	005	0	01	005-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
	os Alamos National Laboratory	005	0	01	005-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=		Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
	os Alamos National Laboratory	005	0	01	005-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=		Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
	os Alamos National Laboratory	005	0	01	005-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
	os Alamos National Laboratory	005	0	01	005-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Lc	os Alamos National Laboratory	005	0	01	005-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
	os Alamos National Laboratory	005	0	01	005-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Lc	os Alamos National Laboratory	005	θ	01	005 IW	IW-Impaired Water	00010-1-0	Temperature, water deg. centigrade	<=		Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Lc	os Alamos National Laboratory	009	0	01	009-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
NMR050013 Lc	os Alamos National Laboratory	009	0	01	009-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=		Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013 Lc	os Alamos National Laboratory	009	0	01	009-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000 [	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013 Lc	os Alamos National Laboratory	009	0	01	009-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=		Maximum	ug/L	1/60	Gr	10/1/2019		1/31/2020
NMR050013 Lc	os Alamos National Laboratory	009	0	01	009-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Lc	os Alamos National Laboratory	009	0	01	009-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=	7 [	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Lo	os Alamos National Laboratory	009	0	01	009-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=	0.2 [	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Lc	os Alamos National Laboratory	009	Ð	01	009-IW	IW Impaired Water	00010-1-0	Temperature, water deg. centigrade	<b>4=</b>		Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Lc	os Alamos National Laboratory	012	0	01	012-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
NMR050013 Lc	os Alamos National Laboratory	012	0	01	012-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013 Lc	os Alamos National Laboratory	012	0	01	012-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013 Lc	os Alamos National Laboratory	012	0	01	012-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
NMR050013 Lc	os Alamos National Laboratory	012	0	01	012-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Lc	os Alamos National Laboratory	012	0	01	012-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=	7 1	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Lc	os Alamos National Laboratory	012	0	01	012-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=	0.2	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Le	os Alamos National Laboratory	012	θ	<del>01</del>	<del>012-IW</del>	IW-Impaired Water	00010-1-0	Temperature, water deg. centigrade	<b>&lt;=</b>	24	Maximum	<del>deg C</del>	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
				j													
NMR050013 Lo	os Alamos National Laboratory	017	AA, F	AA1, F4	<del>017-11</del>	11 Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<b>&lt;=</b>	1010	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
NMR050013 Lc	os Alamos National Laboratory	017	AA, F	AA1, F4	<del>017-11</del>	11 Fabricated Metal Products, except Coating	01040-1-0	Copper, dissolved [as Cu]	<b>←=</b>	4 4	<del>Maximum</del>	ug/L	1/60	Gf	4/1/2019	5/31/2019	7/31/2019
NMR050013 Lo	os Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11 Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<b>&lt;=</b>	1000 A	<del>Maximum</del>	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
NMR050013 Lo	os Alamos National Laboratory	017	AA, F	AA1, F4	<del>017-11</del>	11 Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<b>4=</b>	4 86.0	<del>Maximum</del>	mg/L	1/60	Gr	4 <del>/1/2019</del>	5/31/2019	7/31/2019
NMR050013 Le	os Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11 Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<b>&lt;=</b>	4 66	<del>Maximum</del>	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
NMR050013 Lo	os Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11 Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<b>4=</b>	1010 A	<del>Maximum</del>	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013 Lo	os Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11-Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as Cu]	<b>&lt;=</b>	7 4	<del>Vaximum</del>	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019

										rk, and Impaired Waters						
		Permitted			Consolidated Discharge #		Parameter	the NW Water	Quanty Sta	Quality	C [New INIEX	Freq. of	Smpl.	Monitoring Period Start	Monitoring Period End	DMR Due
Permit ID	Facility	Feature	Sector(s)	Subsector	(Limit Set)	Discharge Description	Code	Parameter Name	Symbol	Value Limit Typ	e Units	Analysis	Туре	Date	Date	Date
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11 Fabricated Metal Products, except Coating	01045-1-0	Iron, total (as Fe)	<b>4=</b>	1000 Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	4=	0.68 Maximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01090-1-0	Zinc, dissolved [as Zn]	<b>4=</b>	99 Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11 Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<b>&lt;=</b>	1010 Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as-Cu]	<b>&lt;=</b>	7 Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01045-1-0	Iron, total [as Fe]	<b>←</b>	1000 Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	51450-1-0	Nitrite Plus Nitrate Total	<b>4=</b>	0.68 Maximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11 Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<b>&lt;=</b>	99 Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11 Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<b>4=</b>	1010 Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11 Fabricated Metal Products, except Coating	01040-1-0	Copper, dissolved [as Cu]	<b>4=</b>	7 Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11 - Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<b>&lt;=</b>	1000 Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11 Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<b>&lt;=</b>	0.68 Maximum	mg/L	1/60	Gf C*	10/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<b>4=</b>	99 Maximum	ug/L	1/60	Gr Gr	10/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-IW	IW Impaired Water IW Impaired Water	01104 1 0 01040 1 0	Aluminum, total recoverable [as Al]	<= <=	1010 Maximum 7 Maximum	ug/L	1/YR 1/YR	Gr	4/1/2019 4/1/2019	11/30/2019 11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-IW	IW Impaired Water	39516 1 0	Copper, dissolved [as Cu] Polychlorinated biphenyls [PCBs]	<b>←</b>	0.2 Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4		IW Impaired Water	00010 1 0	Temperature, water deg. centigrade	<del>4=</del>	24 Maximum	-	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-IW	Impared water	00010-1-0	Temperature, water deg. centigrade	-	Z4 WidAimium	deg C	27 171	Of .	77172019	11/30/2013	1/31/2020
	I N. C. Haberton	020	AA E	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<b>&lt;=</b>	1010 Maximum	ug/L	1/60	Gf	4/1/2019	5/31/2019	7/31/2019
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11 - Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as Cu]	<b>4=</b>	7 Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01045-1-0	Iron, total [as Fe]	<b>4=</b>	1000 Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<b>4=</b>	0.68 Maximum	mg/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<b>4=</b>	99 Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01104-1-0	Aluminum, total recoverable [as Al]	<b>4=</b>	1010 Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved (as Cu)	<b>4=</b>	7 Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013	Los Alamos National Laboratory  Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	01045 1 0	Iron, total (as Fe)	<b>4=</b>	1000 Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013 NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<b>4=</b>	0.68 Maximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved (as Zn)	<b>&lt;=</b>	99 Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01104-1-0	Aluminum, total recoverable [as Al]	<b>4=</b>	1010 Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as Cu]	<b>4=</b>	7 Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01045-1-0	Iron, total [as Fe]	<b>4=</b>	1000 Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	51450 1-0	Nitrite Plus Nitrate Total	<b>&lt;=</b>	0.68 Maximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<b>&lt;=</b>	99 Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<b>4=</b>	1010 Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	01040-1-0	Copper, dissolved (as Cu)	<b>4=</b>	7 Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<b>&lt;=</b>	1000 Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	51450-1-0	Nitrite Plus Nitrate Total	<b>&lt;=</b>	0.68 Maximum	mg/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<b>4=</b>	99 Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-IW	IW Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<b>&lt;=</b>	1010 Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-IW	IW Impaired Water	01040-1-0	Copper, dissolved [as Cu]	<b>←</b>	7 Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-IW	IW Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<b>4=</b>	0.2 Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-IW	IW Impaired Water	00010-1-0	Temperature, water deg. centigrade	<del>&lt;=</del>	24 Maximum	deg-C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
					000 11	14 Februared Motel Dundwister average Continue	0110410	Aluminum total seconds by far All		1010 14	w-ti	1/50	Cr	A/1/2010	E/21/2010	7/21/2010
NMR050013	S DOWN TO THE REST OF THE PARTY	022	AA	AA1	022-11	11- Fabricated Metal Products, except Coating	0110410	Aluminum, total recoverable [as Al]	<=	1010 Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
NMR050013	Los Alamos National Laboratory	022	AA	AA1	022-11	11- Fabricated Metal Products, except Coating	01045 1 0 51450 1 0	Iron, total [as Fe] Nitrite Plus Nitrate Total	<=	1000 Maximum	ug/L	1/60	Gr Gr	4/1/2019 4/1/2019	5/31/2019	7/31/2019 7/31/2019
NMR050013		022	AA	AA1	022-11	11- Fabricated Metal Products, except Coating 11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<= <=	0.68 Maximum 99 Maximum	mg/L ug/L	1/60	Gr	4/1/2019	5/31/2019 5/31/2019	7/31/2019
NMR050013		022	AA	AA1	022-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010 Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013	Los Alamos National Laboratory	022	AA	AA1	022-11	11- Fabricated Metal Products, except Coating	010410	Iron, total [as Fe]	<=	1000 Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013	Los Alamos National Laboratory	022	AA	AA1	022-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68 Maximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013	Los Alamos National Laboratory	022	AA	AA1	022-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=	99 Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013	Los Alamos National Laboratory	022	AA	AA1	022-11	11- Fabricated Metal Products, except Coating	0110410	Aluminum, total recoverable [as Al]	<=	1010 Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013	Los Alamos National Laboratory	022	AA	AA1	022-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000 Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013	Los Alamos National Laboratory	022	AA	AA1	022-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68 Maximum	mg/L		Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013	A CONTRACTOR OF THE CONTRACTOR	022	_	AA1	022-11	11- Fabricated Metal Products, except Coating		Zinc, dissolved [as Zn]	<=	99 Maximum	ug/L		Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013	Los Alamos National Laboratory	022	AA	AAI	022-11	22 Tabilitated inicial Flouders, except coating	02000 20	lamel appointed fas rul		Jo INGAIIIGH	ug/ L	1,00		0/ 1/ 2013	5/30/2013	, 50/ 201:

								\$ 1004,09CH 4/410		2.4.6	aired Waters Lim 6.4.900 NMAC [N						
Downia ID	Cocility	Permitted Feature	Sector(s)	Subsector	Consolidated Discharge # (Limit Set)	Discharge Description	Parameter Code	Parameter Name	Symbol	Quality Value	Limit Type	Units	Freq. of	Smpl.	Monitoring Period Start Date	Monitoring Period End Date	DMR Due Date
Permit ID	Facility		AA	AA1	022-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
Control of the Contro	Los Alamos National Laboratory	022	AA	AA1	022-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
	Los Alamos National Laboratory  Los Alamos National Laboratory	022	AA	AA1	022-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=		Maximum	mg/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
	Los Alamos National Laboratory	022	AA	AA1	022-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	022	P	P1	022-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	022	P	P1	022-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	022	P	P1	022-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	022	р.	P1	022-IW	IW - Impaired Water	00010-1-0	Temperature, water deg. centigrade	<b>&lt;=</b>		Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
MINIMUSUUTS	tos Alamos National Easoratory	ULL			522										7,2,2020	11,00,000	2,02,2020
NMR050013	Los Alamos National Laboratory	026	P	P1	026-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	026	P	P1	026-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
		026	P	P1	026-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	026	p p	P1	026-IW	IW - Impaired Water	00010 1 0	Temperature, water deg. centigrade	<b>4=</b>		Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	020	-	12	520 144		1000010	The second of th		24	The state of the s	oce c	2/111	- Or	1/1/2019	11/30/2013	1/31/1020
NIMPOECO13	Los Alamos National Laboratory	029	N	N2	029-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
***************************************	Los Alamos National Laboratory	029	N	N2	029-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
		029	N	N2	029-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
111111111111111111111111111111111111111	Los Alamos National Laboratory  Los Alamos National Laboratory	029	N N	N2 N2	029-IW	IW Impaired Water	00010 1 0	Temperature, water deg. centigrade	<b>4=</b>		Maximum	deg-C	1/YR	Gf	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	929	14	IVE	025 111	in imported traces	0001010	remperature, water deg. certagrade		27	WIGARITION	ucge	A) THE	Gi	4/1/2015	11/30/2013	1/31/2020
NIN 4005 001 7	Los Alamos National Laboratory	031	р	P1	031-IW	IW - Impaired Water	51931 1 0	Adjusted Gross Alpha	<=	15	Maximum	pCi/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
		031	P	P1	031-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory		P	P1	031-IW	IW - Impaired Water	71900 1 0	Mercury, total [as Hg]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	031	P	P1	031-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	031	P		031-100	inv - impaned water	3331010	rolychlorillated olphenyls [rebs]		0.2	VIAXIIIIUIII	ug/L	1) 11	- Oi	4/1/2019	11/30/2013	1/31/2020
NI 45050043	Las Alemas National Laboratory	032	Р	P1	032-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	032	n n	P1	032 IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory		P D	P1	032-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	032	P P	P1	032-IW	IW - Impaired Water	00010-1-0	Temperature, water deg. centigrade	<del>&lt;=</del>		Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	032		F±	032 144	inpaned water	00010-1-0	Temperature, water deg. certigrade		24 1	VIOXIIIIUIII	ueg e	<del>2/1N</del>	91	4/1/2019	11/30/2019	1/51/2020
	N. Alexandre	036	Д	P1	036-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<b>4=</b>	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory		D D	P1	036 IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<del>&lt;=</del>		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	036	-	P1	036-IW	IW Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<del></del>		Maximum	ug/L	1/YR	Gf	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	036	P P	P1	036-IW	IW Impaired Water	00010 1 0	Temperature, water deg. centigrade	<b>4=</b>		Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	036	+	71	<del>U30-144</del>	IW - Impaired Water	00010-1-0	remperature, water deg. centigrade		24	vidximum	uege	2/-11	401	4/1/2019	11/30/2019	1/31/2020
		027	P	P1	037-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
	Los Alamos National Laboratory	037	P	P1	037-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019		1/31/2020
NMR050013	Los Alamos National Laboratory		P	P1	037-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=		Maximum	ug/L	1/YR	Gr	The second second second		1/31/2020
NMR050013	Los Alamos National Laboratory	037	-	LT	337-100		15555	- James marco pipitentis (r eps)	\- <u>-</u>	U.Z.I	- MANINGUI	MB/ L	±/ 1ft	UI .	7/1/2013	11,30,2013	1/31/2020
NIMPOTOGGG	Los Alamos National Laboratory	039	P	P1	039-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
	Los Alamos National Laboratory	039	P	P1	039-IW	IW - Impaired Water	0104010	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
	Los Alamos National Laboratory	039	P	P1	039-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
	Los Alamos National Laboratory	039	ρ	P1	039-IW	IW - Impaired Water	00010-1-0	Temperature, water deg. centigrade	<b>4=</b>		<del>Vlaximum</del>	deg-C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	U-55	-	1 1	V35 IV	1.1.1 - 1.1.1 provinces of model.			,	27	- Actividati	GC8-C	ATTR	Gr.	1/1/2019	11/30/2019	1/31/2020
NA ADOSCOSA S	Las Alamas National Laborators	042	D	P1	042-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	042	P	P1	042-IW	IW - Impaired Water	0104010	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	_	P	P1	042-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=		Maximum	ug/L ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	042	P P	P1 P1	042-1W	IW - Impaired Water	00010-1-0	Temperature, water deg. centigrade	<del>=</del>		Maximum Maximum	deg-C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	042	+	+++	<del>012-144</del>	inpance water	00010-1-0	remperature, water begreeningrade	_	24 1	viuximumi	neg-e	1/1A	<del>OI</del>	4/1/2019	11/30/2013	1/31/2020
						D1 - Asphalt Paving and Roofing Materials and											
		043		D1	043-D1	Lubricant Manufacturing	00530 1 0	Solids, total suspended	<=	100	Maximum	me/l	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
NMR050013	Los Alamos National Laboratory	043	D	D1	U43-U1	D1 - Asphalt Paving and Roofing Materials and	00330 10	Johns, total suspended	\ <u></u>	1001	VICALIIIUIII	mg/L	1/00	GI	4/1/2019	3/31/2019	1/21/2019
	499021	040		D1	043-D1	Lubricant Manufacturing	00530 1 0	Solids, total suspended	<=	100	Maximum	madi	1/60	Gr	6/1/2010	7/21/2010	0/20/2010
NMR050013	Los Alamos National Laboratory	043	D	D1	U45-D1	D1 - Asphalt Paving and Roofing Materials and	00330 1 0	Jonas, total suspended	\- <u>-</u>	100 1	Maximum	mg/L	1/60	GI	6/1/2019	7/31/2019	9/30/2019

MMR050013 Los A	Facility  S Alamos National Laboratory  S Alamos National Laboratory	Permitted Feature  043  043  043  043  043	D D D D	Subsector D1 D1 D1 D1	Consolidated Discharge # (Limit Set)  043-D1  043-1D  043-1D	Discharge Description  D1 - Asphalt Paving and Roofing Materials and Lubricant Manufacturing  1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing  1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing	Parameter Code 00530 1 0 00556 1 0	Parameter Name  Solids, total suspended  Oil & Grease	Symbol <=	Quality Value	6.4.900 NMAC [No Limit Type  Maximum		Freq. of Analysis	Smpl.	Monitoring Period Start Date	Monitoring Period End Date	DMR Due Date
MMR050013 Los A	s Alamos National Laboratory	043 043 043 043 043	D D D	D1 D1 D1	043-1D 043-1D	D1 - Asphalt Paving and Roofing Materials and Lubricant Manufacturing  1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing  1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing	Code 00530 1 0	Solids, total suspended		Value			Analysis	Туре	Period Start Date	Period End Date	1
MMR050013 Los A	s Alamos National Laboratory	043 043 043 043	D D D	D1 D1 D1	043-D1 043-1D 043-1D	D1 - Asphalt Paving and Roofing Materials and Lubricant Manufacturing  1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing  1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing	00530 1 0	Solids, total suspended					57565				Date
MMR050013 Los A	s Alamos National Laboratory	043 043 043	D D	D1	043-1D 043-1D	Lubricant Manufacturing  1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing  1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing			<=	100	Maximum	mg/L	1/60	Gr	10/1/2019	44 /00 /0040	
MMR050013 Los A	s Alamos National Laboratory	043 043 043	D D	D1	043-1D 043-1D	1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing 1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing				200			-/	-		11/30/2019	1/31/2020
MMR050013 Los A	s Alamos National Laboratory	043 043 043	D D	D1	043-1D	Lubricant Manufacturing  1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing	00556 1 0	Oil & Grease							20/2/2020	24,00,202	2,22,202
MMR050013 Los A	s Alamos National Laboratory	043 043 043	D			Lubricant Manufacturing			<=	10	30-Day Average	mg/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Los A	s Alamos National Laboratory	043	D			The state of the s											
NMR050013 Los A	s Alamos National Laboratory	043		D1	043-1D		00556 1 0	Oil & Grease	<=	15	Daily Maximum	mg/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Los A	s Alamos National Laboratory	043		D1	043-1D	1D - Asphalt Paving and Roofing Materials and	demonstration of							l /			
NMR050013 Los A	s Alamos National Laboratory s Alamos National Laboratory s Alamos National Laboratory s Alamos National Laboratory		D		0.00	Lubricant Manufacturing	00400 1 0	pH	>=	6	Minimum	SU	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Los A	s Alamos National Laboratory s Alamos National Laboratory s Alamos National Laboratory s Alamos National Laboratory		D	1		1D - Asphalt Paving and Roofing Materials and	0010010	500				511	4.00		4 /4 /2040	44 (20 (2040	4 /04 /000
NMR050013 Los A	s Alamos National Laboratory s Alamos National Laboratory s Alamos National Laboratory	043		D1	043-1D	Lubricant Manufacturing	00400 1 0	pH	<=	9	Maximum	SU	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Los A	s Alamos National Laboratory s Alamos National Laboratory s Alamos National Laboratory	043	_	D4	043.10	1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing	00530 1 0	Solids total suspended		15	30-Day Average	ma/1	1 /VD	c.	4/1/2019	11/20/2010	1/31/2020
NMR050013 Los A	s Alamos National Laboratory s Alamos National Laboratory		D	D1	043-1D	1D - Asphalt Paving and Roofing Materials and	00530 1 0	Solids, total suspended	<=	15	50-Day Average	mg/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Los A	s Alamos National Laboratory s Alamos National Laboratory	043	D	D1	043-1D	Lubricant Manufacturing	00530 1 0	Solids, total suspended	<=	23	Daily Maximum	mg/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Los A NMR050013 Los A	s Alamos National Laboratory	043	D	D1	043-IW	IW - Impaired Water	51931 1 0	Adjusted Gross Alpha	<=		Maximum	pCi/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Los A		043	D	D1	043-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Los A NMR050013 Los A		043	D	D1	043-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Los A NMR050013 Los A	s Alamos National Laboratory	043	D	D1	043-IW	IW - Impaired Water	71900 1 0	Mercury, total [as Hg]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Los A NMR050013 Los A	,																
NMR050013 Los A NMR050013 Los A NMR050013 Los A NMR050013 Los A NMR050013 Los A NMR050013 Los A NMR050013 Los A	s Alamos National Laboratory	074	Α	A4	074-A4	A4 - Hardwood Dimension and Flooring Mills	81017 1 0	Chemical Oxygen Demand [COD]	<=	120	Maximum	mg/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
NMR050013 Los A NMR050013 Los A NMR050013 Los A NMR050013 Los A NMR050013 Los A NMR050013 Los A	s Alamos National Laboratory	074	Α	A4	074-A4	A4 - Hardwood Dimension and Flooring Mills	00530 1 0	Solids, total suspended	<=		Maximum	mg/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
NMR050013 Los A NMR050013 Los A NMR050013 Los A NMR050013 Los A NMR050013 Los A	s Alamos National Laboratory	074	Α	A4	074-A4	A4 - Hardwood Dimension and Flooring Mills	81017 1 0	Chemical Oxygen Demand [COD]	<=		Maximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013 Los A NMR050013 Los A NMR050013 Los A NMR050013 Los A	s Alamos National Laboratory	074	Α	A4	074-A4	A4 - Hardwood Dimension and Flooring Mills	00530 1 0	Solids, total suspended	<=		Maximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013 Los A NMR050013 Los A NMR050013 Los A	s Alamos National Laboratory	074	Α	A4	074-A4	A4 - Hardwood Dimension and Flooring Mills	81017 1 0	Chemical Oxygen Demand [COD]	<=		Maximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013 Los A NMR050013 Los A	s Alamos National Laboratory	074	A	A4	074-A4	A4 - Hardwood Dimension and Flooring Mills	00530 1 0	Solids, total suspended	<=	-	Maximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013 Los A	s Alamos National Laboratory	074	A	A4	074-A4	A4 - Hardwood Dimension and Flooring Mills	81017 1 0 00530 1 0	Chemical Oxygen Demand [COD] Solids, total suspended	<=		Maximum Maximum	mg/L	1/60	Gr	10/1/2019	11/30/2019 11/30/2019	1/31/2020
	s Alamos National Laboratory	074	A	A4 A4	074-A4 074-IW	A4 - Hardwood Dimension and Flooring Mills  IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=		Maximum	mg/L ug/L	1/60 1/YR	Gr Gr	4/1/2019	11/30/2019	1/31/2020
VMR050013 Los A	s Alamos National Laboratory s Alamos National Laboratory	074 074	A	A4 A4	074-IW	IW - Impaired Water	0104010	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
	s Alamos National Laboratory	074	A	A4	074-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
	s Alamos National Laboratory	074	A	A4	074-IW	IW - Impaired Water	00010 1 0	Temperature, water deg. centigrade	<b>4=</b>		Məximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
MINIOSOULS LOST	3 Harris Having Lass State																
VMR050013 Los A	s Alamos National Laboratory	075	Р	P1	075-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Los A	s Alamos National Laboratory	075	Р	P1	075-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=	7	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Los A	s Alamos National Laboratory	075	Р	P1	075-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=		Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013 Los A	s Alamos National Laboratory	075	P	P1	075-IW	IW Impaired Water	00010 1 0	Temperature, water deg. centigrade	<b>&lt;=</b>	<del>2</del> 4	Maximum	deg-C	1/YR	Gŧ	4/1/2019	11/30/2019	1/31/2020
					1												
	s Alamos National Laboratory	076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=		Maximum	ug/L	1/60	Gr	4/1/2020	5/31/2020	7/31/2020
The state of the s	s Alamos National Laboratory	076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	01045 1 0 51450 1 0	Iron, total [as Fe] Nitrite Plus Nitrate Total	<=		Maximum Maximum	ug/L	1/60	Gr C-	4/1/2020	5/31/2020	7/31/2020
	s Alamos National Laboratory	076	AA	AA1	076-11 076-11	11- Fabricated Metal Products, except Coating 11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<= <=		Maximum	mg/L ug/L	1/60 1/60	Gr Gr	4/1/2020 4/1/2020	5/31/2020 5/31/2020	7/31/2020 7/31/2020
	s Alamos National Laboratory	076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=		Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
	s Alamos National Laboratory	076 076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	01045 1 0	iron, total [as Fe]	<=		Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
	s Alamos National Laboratory s Alamos National Laboratory	076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=		Maximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
	s Alamos National Laboratory	076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=		Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
	s Alamos National Laboratory	076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=		Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	
	s Alamos National Laboratory	076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	
1000	s Alamos National Laboratory	076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=		Maximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
VMR050013 Los /	s Alamos National Laboratory	076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=		Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	
NMR050013 Los A	s Alamos National Laboratory	076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
	s Alamos National Laboratory	076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
		076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=		Maximum	mg/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
	s Alamos National Laboratory	076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=		Maximum	ug/L ug/L	1/60	Gr			1/31/2020
NMR050013 Los A		076	AA	AA1	076-IW	IW - Impaired Water	107704 7 0	Aluminum, total recoverable [as Al]	<=	TOTO	Maximum	11971	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020

										The same of the sa	paired Waters Lin .6.4.900 NMAC [N	CONTRACTOR OF STREET					
		Permitted		Subsector	Consolidated Discharge # (Limit Set)		Parameter Code	Parameter Name	Symbol	Quality Value	Limit Type	Units	Freq. of		_	Monitoring Period End Date	DMR Due Date
Permit ID	Facility	Feature	Sector(s)	Subsector	(Limit Set)	Discharge Description	Code	Parameter (value	Зуппоп	Value	Limit Type	Ullits	Allalysis	Type			
NMR050013	Los Alamos National Laboratory	076	AA	AA1	076-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=	0.2	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
Additions to N	OI and NetDMR are in <b>BOLD</b> .																
Deletions from	NOI and NetDMR are indicated by	strikethrough	-														
	dicates no change to NOI or NetDM																

## ATTACHMENT 2: SWPPP AMENDMENTS

Date	Plan Section	Reason for Amendment	Amendment
Jan 2019	All	New MSGP Plan for new	New MSGP Plan for Triad, LLC (replacing
		Laboratory Contract.	LANS, LLC.
Jan 2020	All	Implementation of the new	Inserted new template language to
		SWPPP template as required	standardize all MSGP SWPPPs and
		by EPC-CP-QP-2110, MSGP	inserted all required documentation for
		Stormwater Pollution	the yearly revision.
		Prevention Plan Preparation	
		and Maintenance. Also	
		included all inspections,	
		assessments and reports	
		required for the yearly	
		update.	

ATTACHMENT 3: CERTIFICATION OF NO UNAUTHORIZED STORMWATER DISCHARGES

# Unauthorized Non-Storm Water Discharge Assessment and Certification

Facility: TA-03-38 Ca	arpentry &	Metal Fabr	ication S	hop				
Outfalls (including SIOs*) or Other Onsite Drainage Points Observed During the Assessment	1	d Potential S orm Water Di				escription of sment Criterion Used		ed Actions to Control or the Discharge
MFS: 002	None				Visu	l Inspection	N/A	
CS: 074 (073)	None				Visu	Il Inspection	N/A	
			·					
	-					:		
Assessor:	*				-to-t-Man-			
Print Name: Jillian E. Burgin		Signature:	Jeenin	Bung		Title: DEP, CISEC		Date Assessed: 12/18/18
Authorized Signatory: I certi that qualified personnel properly g responsible for gathering the infor submitting false information, include	gathered and ever mation, the info	valuated the info ormation contain oility of fine and in	rmation cont ed is, to the	tained therein. E best of my knov	Based on my in Wledge and be	quiry of the person o	r persons who manage the syste	m, or those persons directly
Print Name: Russell Ston	e,	Signature	ull	Stre		Title: ESH kkg - 4	DESH-UTS	Date Certified:

\*SIO = Substantially Identical Outfall

ATTACHMENT 4: DULY AUTHORIZED SIGNATORY MEMORANDUM



# Environmental Protection & Compliance Division

Los Alamos National Laboratory PO Box 1663, K490 Los Alamos, NM 87545 505-667-0666

Symbol: EPC-DO: 18-453

*LAUR*: 18-31574

DEC 1 1 2018

Ms. Anne L. Idsal, Regional Administrator U.S. Environmental Protection Agency, Region 6 1445 Ross Avenue, Suite 1200 Mail Code: 6RA Dallas, TX 75202-2733

Subject: Notification of Triad National Security, LLC, Signatory Officials and

**Authorized Representatives for NPDES Permits** 

Dear Ms. Idsal:

The purpose of this letter is to provide an update to the U. S. Environmental Protection Agency (EPA) Region 6 on the Triad National Security, LLC delegation of authority for signature of documents associated with the various Los Alamos National Laboratory (LANL) NPDES Permits, pursuant to 40 CFR 122.22(c). This letter supersedes and replaces the signatory authority letter dated March 14, 2018 (ADESH: 18-017).

The positions of Associate Laboratory Director of Environment, Safety, Health & Quality and Safeguards & Security (ESHQSS), and Division Leader of the Environmental Protection & Compliance Division (EPC-DO) are identified as Triad's primary signatory officials under 40 CFR 122.22(a) for certifying and signing permit applications (including Notice of Intents (NOIs)) required under the LANL NPDES Industrial Point Source Outfall Permit (Permit No. NM0028355), the NPDES Storm Water Construction General Permit, the NPDES Multi-Sector General Permit (Permit No. NMR050013), and the NPDES Pesticide General Permit (Permit No. NMG87B113).

The following positions are hereby designated as authorized representatives under 40 CFR 122.22(b) to sign reports, Storm Water Pollution Prevention Plans, Discharge Monitoring Reports, Pesticide Discharge Management Plans, and any other compliance documentation required by the permits:



EPC-DO: 18-453 Ms. Anne L. Idsal

## NPDES Industrial Point Source Outfall Permit (No. NM0028355)

- Positions listed as primary signatory officials above.
- Group Leader or Team Leaders within the Environmental Compliance Programs Group.
- Responsible Facility Operations Director (FOD).

### **NPDES Construction General Permit:**

- Positions listed as primary signatory officials above.
- Group Leader or Team Leaders within the Environmental Compliance Programs Group.
- Cognizant Project Manager, Construction Manager, or Subcontractor Technical Representative for the regulated construction activity.

### NPDES Multi-Sector General Permit (ID No. NMR053195)

- Positions listed as primary signatory officials above.
- Group Leader or Team Leaders within the Environmental Compliance Programs Group.
- Division Leader, Deputy Division Leader, or Group Leader of the LANL division responsible for the overall operation of the regulated facility or activity.
- Responsible FOD; Deputy FOD, Operations Manager; or Deployed Environment, Safety, & Health Manager responsible for the overall operation of the regulated facility or activity.

## NPDES Pesticide General Permit (No. NM687A041)

- Positions listed as primary signatory officials above.
- Group Leader or Team Leaders within the Environmental Compliance Programs Group.

If you have questions, please contact me at (505) 667-7269 or at etorres@lanl.gov.

Sincerely.

Enrique Torres Division Leader

Environmental Protection & Compliance Division

ET/TWL/MTS:jdm



EPC-DO: 18-453 Ms. Anne L. Idsal

Attachment(s): None.

Copy: Nancy Williams, USEPA, Region 6, williams.nancy@epa.gov, (E-File) Brent E. Larsen, USEPA, Region 6, Larsen.brent@epa.gov, (E-File) Robert Houston, USEPA, Region 6, Houston.robert@epa.gov, (E-File) Sarah Holcomb, NMED, sarah.holcomb@state.nm.us, (E-File) Karen E. Armijo, LASO-MA-LS, Karen.armijo@nnsa.doe.gov, (E-File) Jody Pugh, NA-LA, jody.pugh@nnsa.doe.gov, (E-File) Michael W. Hazen, ESHQSS, mhazen@lanl.gov, (E-File) William R. Mairson, ESHQSS, wrmairson@lanl.gov, (E-File) Enrique Torres, EPC-DO, etorres@lanl.gov, (E-File) Taunia Van Valkenburg, EPC-CP, tauniav@lanl.gov, (E-File) Michael T. Saladen, EPC-CP, saladen@lanl.gov, (E-File) Terrill W. Lemke, EPC-CP, tlemke@lanl.gov, (E-File) Tim Dolan, GC-ESH, tdolan@lanl.gov, (E-File) emla.docs@em.doe.gov, (E-File) locatesteam@lanl.gov, (E-File) epc-correspondence@lanl.gov, (E-File) adesh-records@lanl.gov, (E-File)



ATTACHMENT 5: DISCHARGE MONITORING REPORTS

Pern	nit																				
ern	nit #:	NMR	50013		Permitt	tee:		TRIAD	NOITAN C	IAL SECL	JRITY	Y LLC			Facilit	y:	LO	S ALAM	OS NAT	IONAL LABORATORY	
/lajo	r:	No			Permitt	tee Addres			OX 1663 N ALAMOS,		5				Facilit	y Locatio		BOX 16 S ALAM		87545	
Perm	nitted Feature:	074 Extern	nal Outfall		Discha	rge:		<b>074-A</b> Hardv		ension and	d Flo	oring Mills									
Repo	ort Dates & Status											J									
	toring Period:	From	04/01/19 to 05/31/	/19	DMR D	ue Date:		07/31	/19						Status	s:	Ne	DMR Va	lidated		
Cons	siderations for Form	Comp	letion		ı																
Princ	cipal Executive Office	er																			
irst	Name:				Title:										Teleph	none:					
ast	Name:													•							
Vo D	ata Indicator (NODI)				·																
orn	NODI:																				
	Parameter		Monitoring Location	Season #	Param. NODI				ity or Loadi	,						oncentration			# of Ex.	Frequency of Analysis	Sample Type
ode	Name					Sample	Qualifier 1	Value 1	Qualifier 2	Value 2 Ur	nits Qı	ualifier 1 Valu	ue 1 G	Qualifier 2	Value 2		Value 3 21.2	Units 19 - mg/L		01/60 - Once Every 2 Months	CP - CPAR
0530	Solids, total suspended		1 - Effluent Gross	0		Permit Req.							$\dashv$				100 MAXIMUM			01/60 - Once Every 2 Months	
						Value NODI															
1017	Chemical Oxygen Demand	ICODI	1 - Effluent Gross	0		Sample Permit Req.											47.4 120 MAXIMUN	19 - mg/L		01/60 - Once Every 2 Months 01/60 - Once Every 2 Months	
1017	onemical Oxygen Demand	[OOD]	1 Emacin Gross	J		Value NODI										<u></u>	120 WI/OXIIVIOIV	13 Hig/L		51700 Chiec Every 2 Months	OK OKAD
Subi	mission Note																				
fap	arameter row does no	t conta	in any values for th	ne Sampl	le nor Effluer	nt Trading,	then none	of the	following	fields will	be s	submitted fo	r tha	nt row: Ur	nits, Nu	umber of E	xcursions, F	requenc	of Ana	lysis, and Sample Type.	
Edit	Check Errors																				
Vo e	rrors.																				
Com	ments																				
A-U	R-19-26304.																				
Atta	chments																				
o atta	achments.																				
	ort Last Saved By																				
TRIA	D NATIONAL SECU	RITY LI	LC																		
Jser				eslie@lar	_																
lam	e:		L	eslie D	ale																
E-Ma	il:			eslie@lar	_																
	Time:		2	019-07-0	9 10:30 (T	Time Zone:	-05:00)														
Repo	ort Last Signed By																				
Jser			Т	ERRILLL	LEMKE																
Nam	e:	Terrill			emke																
E-Ma	il:	tlemke@			anl.gov																
Date	Time:		2	019-07-0	9 13:07 (T	ime Zone:	-05:00)														

Permit																			
Permit #	#: NM	R050013		Per	rmittee:		TRIA	AD NATIO	NAL SEC	URITY LLC			F	Facility:	LOS ALAMOS N	IATIONA	L LABC	DRATORY	
Major:	No			Per	rmittee A	ddress:			3 MS K490 5, NM 8754				F	Facility Location:	PO BOX 1663 LOS ALAMOS, N	NM 8754	5		
Permitte	ed Feature: 002 Exte	ernal Outfall		Dis	scharge:		<b>002-</b> l Impa	- <b>IW</b> aired Wate	ər										
Report	Dates & Status												_						
Monitor	ing Period: Fro	m 12/01/18 to 11/3	30/19	DN	IR Due Da	ate:	01/3	1/20					S	Status:	NetDMR Validat	ted			
Conside	erations for Form Complet	ion											-						
Yearly b	ased upon the alternate mor	nitoring season of	April 1 through	n Novembe	r 30.														
Principa	al Executive Officer																		
First Na	me:			Titl	le:								Т	Telephone:					
Last Na	me:												•						
No Data	Indicator (NODI)																		
Form N	ODI:																		
	Parameter	Monitoring Location	on Season # Par	ram. NODI			tity or Loadin							ality or Concentration			# of Ex	c. Frequency of A	nalysis Sample Typ
Code	Name					Qualifier 1 Value	1 Qualifier 2	Value 2 Uni	its Qualifier	1 Value 1 Qu	ualifie	er 2 Value 2 0	Qualifier	3	Value 3	Units			
00010	Femperature, water deg. centigrad	e 1 - Effluent Gross	0		Sample ermit Req.				_			<	:=	24 MAXIMUM		04 - deg 0		01/YR - Annual	GR - GRAB
				Va	alue NODI									9 - Conditional Monito	oring - Not Required This Period				
v	Connex discolved for Cul	1 - Effluent Gross	0		Sample							=		24.9 7 MAXIMUM		28 - ug/L		01/YR - Annual 01/YR - Annual	GR - GRAB GR - GRAB
<b>∧</b> 01040 \	Copper, dissolved [as Cu]	1 - Elliuent Gloss	0		ermit Req.								=	/ WAXIWOW		28 - ug/L	-	01/TR - Allilual	GR - GRAD
					Sample							-		222		28 - ug/L		01/YR - Annual	GR - GRAB
01104	Aluminum, total recoverable	1 - Effluent Gross	0		ermit Req.		-					<	=	1010 MAXIMUM		28 - ug/L	0	01/YR - Annual	GR - GRAB
					Sample							<	:	0.351		28 - ug/L		01/YR - Annual	GR - GRAB
X 39516 I	Polychlorinated biphenyls [PCBs]	1 - Effluent Gross	0	Pe	ermit Req.							<	=	.2 MAXIMUM		28 - ug/L	0	01/YR - Annual	GR - GRAB
0/	alam Nata			Va	alue NODI														
	sion Note		0   5	· · · ·	P 4	641 64			1 20 1			· • •			(	_			
	meter row does not contain	any values for the	Sample nor Et	ffluent Trac	ding, then	none of the foll	lowing field	s will be s	submitted t	for that row	: Uni	its, Numbe	r of Exc	cursions, Frequency	of Analysis, and Sample 1	ype.			
Edit Ch	eck Errors																		
	Parameter		Monitori	ing Locatio	n		Field	d		T	/pe				Description				Acknowledge
Code	Name		WOTHLOTT	ing Location	"		1 1610	и		۱,	/he				Description				Acknowledge
39516	Polychlorinated biphenyls [F	PCBs]	1 - Effluent Gro	oss	Qu	uality or Concent	tration Samp	ole Value 3		Soft		The provio	ded sam	nple value is outside th	ne permit limit. (Error Code: 1	)			Yes
01040	Copper, dissolved [as Cu]		1 - Effluent Gro	oss	Qu	uality or Concent	tration Samp	ole Value 3		Soft		The provid	ded sam	nple value is outside th	ne permit limit. (Error Code: 1	)			Yes
Comme	nts																		
	9-25383. The impaired water	er pollutant Cu exc	eeded the Nev	w Mexico V	Vater Qual	lity Standard.	Total Aroclo	ors were n	ot detecte	d however	the c	detection li	mit exc	eeded the New Mex	cico Water Quality Standar	d due to a	a 10X d	dilution applied of	during extraction
Attachn	nents																		
No attachn	nents.																		
	Last Saved By																		
TRIAD	NATIONAL SECURITY LLC																		
User:			leslie@lanl	l.gov															
Name:			Leslie Da	ale															
E-Mail:			leslie@lanl	l.gov															
Date/Tin	ne:		2019-06-1	1 16:05 (	Time Zone	e: -05:00)													
Report	Last Signed By																		
User:			saladen@l																
Name:			Michael S																
E-Mail:			saladen@l	_															
Date/Tin	ne:		2019-06-12	2 11:13 (	Time Zone	ə: -05:00)													

Permit																						
Permit	#:	NMR05	0013		Permitte	e:	T	TRIAD I	NATIONA	L SECL	IRITY	LLC		F	acility:		LOS	ALAMO	S NAT	IONAL LABORA	TORY	
Major:		No			Permitte	e Address			K 1663 MS AMOS, N		5			F	acility	Location	: PO E LOS	BOX 166 ALAMO		87545		
Permitt	ed Feature:	074 External	l Outfall		Discharg	ge:		<b>)74-A4</b> Hardwo	od Dimen	sion and	d Floo	oring Mills	S									
Report	Dates & Status				ı																	
Monito	ring Period:	From 06	6/01/19 to 07/31/19	)	DMR Due	e Date:	C	09/30/1	9					S	tatus:		NetD	MR Val	idated			
Consid	lerations for Form	Complet	ion																			
Princip	al Executive Office	er																				
First Na	ame:				Title:									Т	elepho	ne:						
Last Na	ame:																					
No Dat	a Indicator (NODI)																					
Form N	IODI:																					
Codo	Parameter		Monitoring Location	Season #	Param. NOD	I	Ouglities 4		ty or Loadii Qualifier 2		llmita C	Number of 1	Value 4 O		-	ncentration	Value 3		# of Ex.	Frequency of A	nalysis	Sample Type
Code	Name					Sample	Qualifier	value 1	Qualifier 2	value 2	Units	Rualifier 1	value 1 Q	uaimer 2	value 2			Units 19 - mg/L		01/60 - Once Every	2 Months	GR - GRAB
<b>X</b> 00530	Solids, total suspended		1 - Effluent Gross	0 -		Permit Req											100 MAXIMUM			01/60 - Once Every		
						Value NOD											75.3	19 - mg/L		01/60 - Once Every	2 Months	GP - GPAR
81017	Chemical Oxygen Dem	and [COD]	1 - Effluent Gross	0 -		Permit Req											120 MAXIMUM			01/60 - Once Every		
						Value NOD																
	ssion Note																					
If a para	ameter row does no	t contain	any values for the	Sample no	or Effluent	Trading, the	en none of	f the fo	llowing fie	lds will l	oe sub	omitted fo	or that ro	w: Units	, Numb	er of Exc	ursions, Frequ	uency of	Analys	sis, and Sample	Гуре.	
Edit Ch	eck Errors																					
	Parameter		BA it i				et a ta				<b>T</b>					D-					A - I.u.	
Code	Name	)	Monitoring	Location			Field				Type					De	scription				ACKN	owledge
00530	Solids, total suspe	nded	1 - Effluent Gros	SS	Quality	or Concent	ration Sam	ple Valu	ıe 3	5	Soft	The pr	rovided sa	ample val	ue is ou	itside the p	permit limit. (Er	ror Code	: 1)			Yes
Commo	ents																					
LA-UR-	19-29666.																					
Attachi	ments																					
No attach																						
	Last Saved By																					
TRIAD	NATIONAL SECU	RITY LLC																				
User:				ie@lanl.g																		
Name:				lie Dale																		
E-Mail:				ie@lanl.g																		
Date/Ti			201	9-09-25	14:40 (Tir	ne Zone: -(	)5:00)															
	Last Signed By																					
User:				RRILLLEN																		
Name:				rill Leml																		
E-Mail:				nke@lanl.		_																
Date/Ti	me:		201	9-09-25	17:35 (Tin	ne Zone: -(	05:00)															

Permit
I CIIIII

Major:

Permit #:

NMR050013

External Outfall

Permittee: TRIAD NATIONAL SECURITY LLC

**Permittee Address:** 

PO BOX 1663 MS K490

LOS ALAMOS, NM 87545

**Facility Location:** 

Facility:

LOS ALAMOS NATIONAL LABORATORY

# of Ex. Frequency of Analysis Sample Type

PO BOX 1663

LOS ALAMOS, NM 87545

076

No

076-11 Discharge:

Fabricated Metal Products, except Coating

Report Dates & Status

**Permitted Feature:** 

**Monitoring Period:** 

From 06/01/19 to 07/31/19

Monitoring Location Season # Param. NODI

**DMR Due Date:** 

09/30/19

**Quantity or Loading** 

Status:

**Quality or Concentration** 

**NetDMR Validated** 

**Considerations for Form Completion** 

**Principal Executive Officer** 

**First Name: Last Name:**  Title:

Telephone:

No Data Indicator (NODI)

Form NODI:

							,	- 3				,						
Code	Name				Qualifier 1	Value 1	Qualifier 2	Value 2 Ur	its Quali	fier 1 Value	1 Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
				Sample										3340	28 - ug/L		01/60 - Once Every 2 Months	GR - GRAB
X 01045	Iron, total [as Fe]	1 - Effluent Gross	0	 Permit Req.									<=	1000 MAXIMUM	1 28 - ug/L	1	01/60 - Once Every 2 Months	GR - GRAB
				Value NODI														
				Sample										135	28 - ug/L		01/60 - Once Every 2 Months	GR - GRAB
X 01090	Zinc, dissolved [as Zn]	1 - Effluent Gross	0	 Permit Req.									<=	99 MAXIMUM	28 - ug/L	1	01/60 - Once Every 2 Months	GR - GRAB
				Value NODI														
				Sample										1490	28 - ug/L		01/60 - Once Every 2 Months	GR - GRAB
X 01104	Aluminum, total recoverable	1 - Effluent Gross	0	 Permit Req.									<=	1010 MAXIMUM	l 28 - ug/L	1	01/60 - Once Every 2 Months	GR - GRAB
				Value NODI														
				Sample										0.82	19 - mg/L		01/60 - Once Every 2 Months	GR - GRAB
X 51450	Nitrite Plus Nitrate Total	1 - Effluent Gross	0	 Permit Req.									<=	.68 MAXIMUM	19 - mg/L	1	01/60 - Once Every 2 Months	GR - GRAB
				Value NODI														

# **Submission Note**

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

### **Edit Check Errors**

	Parameter	Monitoring Location	Field	Type	Description	Acknowledge
Code	Name	Monitoring Location	Fleiu	Туре	Description	Ackilowieuge
01090	Zinc, dissolved [as Zn]	1 - Effluent Gross	Quality or Concentration Sample Value 3	Soft	The provided sample value is outside the permit limit. (Error Code: 1)	Yes
51450	Nitrite Plus Nitrate Total	1 - Effluent Gross	Quality or Concentration Sample Value 3	Soft	The provided sample value is outside the permit limit. (Error Code: 1)	Yes
01104	Aluminum, total recoverable	1 - Effluent Gross	Quality or Concentration Sample Value 3	Soft	The provided sample value is outside the permit limit. (Error Code: 1)	Yes
01045	Iron, total [as Fe]	1 - Effluent Gross	Quality or Concentration Sample Value 3	Soft	The provided sample value is outside the permit limit. (Error Code: 1)	Yes

### **Comments**

LA-UR-19-29666.

**Attachments** No attachments.

User:

Name: E-Mail:

Report Last Saved By

TRIAD NATIONAL SECURITY LLC

leslie@lanl.gov User: Leslie Dale Name: E-Mail: leslie@lanl.gov

Date/Time: 2019-09-25 14:40 (Time Zone: -05:00)

Report Last Signed By

TERRILLLEMKE Terrill Lemke tlemke@lanl.gov

Date/Time: 2019-09-25 17:35 (Time Zone: -05:00)

Pern	nit													_									
Perm	nit #:	NMR	50013		Permit	tee:		TRIAD	NATION	AL SECL	JRITY LLC			Facility	y:		LOS	ALAMO	OS NAT	TION	AL LABORA	TORY	
Majo	or:	No			Permit	tee Addres	s:		OX 1663 M ALAMOS, I		5			Facility	y Locatio	n:		OX 16 ALAMO	63 OS, NM	1 875	45		
Perm	nitted Feature:	074 Extern	nal Outfall		Discha	arge:		<b>074-A</b> Hardw		nsion an	d Flooring	Mills											
Repo	ort Dates & Stati	us																					
	itoring Period:		08/01/19 to 09/30/	/19	DMR D	ue Date:		11/30/	19					Status	:		NetD	MR Va	lidated	d			
Cons	siderations for F	Form Comp	letion		•																		
Princ	cipal Executive	Officer																					
	Name:				Title:									Teleph	one:								
	Name:																						
No E	Data Indicator (N	IODI)																					
	n NODI:																						
	Parameter		Monitoring Location	Season #	# Param. NODI	1		Quanti	ty or Loadir	ng			Qua	lity or Co	ncentration	า			# of Ex.	. Fr	equency of Ar	alysis	Sample Type
Code	Name	)					Qualifier 1	1 Value 1	Qualifier 2	Value 2 Ur	nits Qualifie	r 1 Value 1	Qualifier	2 Value 2				Units					
00520	Solids, total suspend	dod	1 - Effluent Gross	0		Sample Permit Req.										90 100 MAXI		9 - mg/L			- Once Every		
00330	Solids, total suspend	ueu	1 - Ellidelli Gloss	U	_	Value NODI									<u></u>	TOO WAXI	IVIOIVI	9 - IIIg/L	U	01/00	- Office Every	2 IVIOITII IS	GK - GKAD
						Sample										37.4		9 - mg/L			- Once Every		
81017	Chemical Oxygen D	emand [COD]	1 - Effluent Gross	0		Permit Req. Value NODI									<=	120 MAXI	MUM 1	9 - mg/L	0	01/60	- Once Every	2 Months	GR - GRAB
Subi	mission Note					Value NODI																	
		es not conta	in any values for th	ne Samp	le nor Efflue	ent Trading, t	then non	e of the	following	fields will	l be submi	tted for th	at row: l	Jnits. Nu	ımber of F	xcursion	ns. Fre	auenc\	of Ana	alvsis	and Sampl	e Type.	
	Check Errors		,,			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,								, , , , ,			,	-,,		,	,	)	
	rrors.																						
	ments																						
	JR-19-30860																						
	chments																						
	achments.																						
Repo	ort Last Saved E	3 <i>y</i>																					
TRIA	AD NATIONAL S	ECURITY L	LC																				
User	:		le	eslie@lar	nl.gov																		
Nam	e:		L	eslie D	Dale																		
E-Ma	ail:		le	eslie@lar	nl.gov																		
Date	/Time:				25 09:10 (T	Time Zone:	-05:00)																
Repo	ort Last Signed	By																					
User			Т	ERRILLI	LEMKE																		
Nam				errill L																			
E-Ma				emke@l																			
	/Time:				25 09:32 (T	Time Zone:	-05:00)																
							,																

Permit

Major:

Permit #: NMR050013

Permittee: TRIAD NATIONAL SECURITY LLC

**Facility Location:** 

Facility:

LOS ALAMOS NATIONAL LABORATORY

No

**Permittee Address:** PO BOX 1663 MS K490 LOS ALAMOS, NM 87545 PO BOX 1663

LOS ALAMOS, NM 87545

**Permitted Feature:** 

076 External Outfall Discharge: 076-11

Fabricated Metal Products, except Coating

Report Dates & Status

**Monitoring Period:** From 08/01/19 to 09/30/19 **DMR Due Date:** 11/30/19

Status:

**NetDMR Validated** 

**Considerations for Form Completion** 

**Principal Executive Officer** 

First Name:

Title:

Telephone:

**Last Name:** 

No Data Indicator (NODI)

Form NODI:

	Parameter	Wonitoring Location	Season #	F Param. NODI			Quantii	ty or Loadir	19			Quan	ity or Co	oncentratio	n		# Of EX.	Frequency	or Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2 Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units				
					Sample										1390	28 - ug/L		01/60 - Once Ev	ery 2 Months	GR - GRAB
X 01045	ron, total [as Fe]	1 - Effluent Gross	0		Permit Req.									<=	1000 MAXIMUM	28 - ug/L	1	01/60 - Once Ev	ery 2 Months	GR - GRAB
					Value NODI															
					Sample										166	28 - ug/L		01/60 - Once Ev	ery 2 Months	GR - GRAB
X 01090	Zinc, dissolved [as Zn]	1 - Effluent Gross	0		Permit Req.									<=	99 MAXIMUM	28 - ug/L	1	01/60 - Once Ev	ery 2 Months	GR - GRAB
					Value NODI															
					Sample										896	28 - ug/L		01/60 - Once Ev	ery 2 Months	GR - GRAB
01104	Aluminum, total recoverable	1 - Effluent Gross	0		Permit Req.									<=	1010 MAXIMUM	28 - ug/L	0	01/60 - Once Ev	ery 2 Months	GR - GRAB
					Value NODI															
					Sample										0.755	19 - mg/L		01/60 - Once Ev	ery 2 Months	GR - GRAB
X 51450	Nitrite Plus Nitrate Total	1 - Effluent Gross	0		Permit Req.									<=	.68 MAXIMUM	19 - mg/L	1	01/60 - Once Ev	ery 2 Months	GR - GRAB
					Value NODI															

### **Submission Note**

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

#### **Edit Check Errors**

	Parameter					
Code	Name	Monitoring Location	Field	Туре	Description	Acknowledge
51450	Nitrite Plus Nitrate Total	1 - Effluent Gross	Quality or Concentration Sample Value 3	Soft	The provided sample value is outside the permit limit. (Error Code: 1)	Yes
01045	Iron, total [as Fe]	1 - Effluent Gross	Quality or Concentration Sample Value 3	Soft	The provided sample value is outside the permit limit. (Error Code: 1)	Yes
01090	Zinc, dissolved [as Zn]	1 - Effluent Gross	Quality or Concentration Sample Value 3	Soft	The provided sample value is outside the permit limit. (Error Code: 1)	Yes

### **Comments**

LA-UR-19-30860. The concentration of Fe is mathematically certain to exceed the benchmark.

**Attachments** 

No attachments.

E-Mail:

Report Last Saved By

TRIAD NATIONAL SECURITY LLC

User: leslie@lanl.gov Leslie Dale Name: E-Mail: leslie@lanl.gov

Date/Time: 2019-10-25 09:10 (Time Zone: -05:00)

Report Last Signed By

**TERRILLLEMKE** User: Terrill Lemke Name:

tlemke@lanl.gov Date/Time: 2019-10-25 09:32 (Time Zone: -05:00)

Pern	nit																		
Pern	nit #:	NMR0	50013		Permitt	ee:		TRIAD NATI	ONAL SECU	RITY LLC			Facility	:	LO	S ALAMO	OS NAT	IONAL LABORATORY	
Majo	r:	No			Permitt	ee Address		PO BOX 166 LOS ALAMO	3 MS K490 S, NM 87545	5			Facility	Location		BOX 16 S ALAMO		87545	
Pern	nitted Feature:	074 Extern	al Outfall		Discha	rge:		<b>074-A4</b> Hardwood D	imension and	Flooring	Mills								
Repo	ort Dates & Status				·														
Mon	toring Period:	From	10/01/19 to 11/30/	19	DMR D	ue Date:		01/31/20					Status:		Net	DMR Va	lidated		
Cons	siderations for Form	Compl	etion		·								-						
Princ	cipal Executive Office	er																	
First	Name:				Title:								Telepho	one:					
Last	Name:																		
No E	ata Indicator (NODI)				·														
Forn	NODI:																		
	Parameter		Monitoring Location	Season #	Param. NODI			Quantity or Lo						centration			# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Sample	Qualifier 1	Value 1 Qualifi	er 2 Value 2 Uni	its Qualifier	r 1 Value 1	Qualifier 2	2 Value 2 (		Value 3 89	Units 19 - mg/L		01/60 - Once Every 2 Months	CD CDAR
00530	Solids, total suspended		1 - Effluent Gross	0		Permit Req.							<		o9 100 MAXIMUM			01/60 - Once Every 2 Months	
	·					Value NODI													
01017	Chemical Oxygen Demand	4 ICODI	1 Effluent Gross	0		Sample Permit Req.									106 120 MAXIMUM	19 - mg/L		01/60 - Once Every 2 Months 01/60 - Once Every 2 Months	
01017	Chemical Oxygen Demand	[COD]	1 - Lindent Oloss	U		Value NODI								.=	120 WAXIWOW	19 - IIIg/L	. 0	51700 - Office Every 2 Months	OK - OKAD
Subi	mission Note																		
If a p	arameter row does no	t contai	in any values for th	e Samp	le nor Effluer	nt Trading, t	hen none	e of the follow	ing fields will l	be submit	tted for th	nat row: U	Jnits, Nur	nber of E	xcursions, F	requency	y of Ana	lysis, and Sample Type.	
Edit	Check Errors																		
No e	rrors.																		
Com	ments																		
LA-U	R-19-32649. The aver	rage of	four monitoring val	lues for	TSS and CO	D do not ex	ceed the	benchmark v	alue therefore	e quarterly	/ monitor	ing will be	e discont	inued pei	r Part 6.2.1.2	2.			
Atta	chments																		
No atta	achments.																		
Repo	ort Last Saved By																		
TRIA	D NATIONAL SECU	RITY LL	C																
User			le	slie@lar	nl.gov														
Nam	e:		Le	eslie D	Dale														
E-Ma	iil:		le	slie@lar	nl.gov														
Date	Time:		20	019-12-1	19 16:30 (T	ime Zone: -	-06:00)												
Repo	ort Last Signed By																		
User	:		Т	ERRILLI	LEMKE														
Nam	e:		T	errill L	emke														
E-Ma	il:		tle	emke@l	anl.gov														
Date	Time:		20	019-12-1	19 16:39 (T	ime Zone: -	-06:00)												

Permit Permit #:

NMR050013

Permittee: TRIAD NATIONAL SECURITY LLC Facility: LOS ALAMOS NATIONAL LABORATORY

Major: No **Permittee Address:** 

Value NODI

PO BOX 1663 MS K490 LOS ALAMOS, NM 87545 **Facility Location:** PO BOX 1663

LOS ALAMOS, NM 87545

**Permitted Feature:** 076

External Outfall

076-11 Discharge:

Fabricated Metal Products, except Coating

Report Dates & Status

**Monitoring Period:** From 10/01/19 to 11/30/19 **DMR Due Date:** 01/31/20

Status:

**NetDMR Validated** 

**Considerations for Form Completion** 

**Principal Executive Officer** 

First Name:

**Last Name:** 

Title:

Telephone:

No Data Indicator (NODI)

Form NODI:

	Parameter	Monitoring Location	Season #	Param. NODI			Quanti	ty or Loadii	ng			Qual	ity or Co	oncentratio	n		# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2 Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
					Sample										7400	28 - ug/L		01/60 - Once Every 2 Months	GR - GRAB
X 01045	[Iron, total [as Fe]	1 - Effluent Gross	0		Permit Req.									<=	1000 MAXIMUM	28 - ug/L	1	01/60 - Once Every 2 Months	GR - GRAB
					Value NODI														
					Sample										1110	28 - ug/L		01/60 - Once Every 2 Months	GR - GRAB
X 01090	Zinc, dissolved [as Zn]	1 - Effluent Gross	0		Permit Req.									<=	99 MAXIMUM	28 - ug/L	1	01/60 - Once Every 2 Months	GR - GRAB
					Value NODI														
					Sample										241000	28 - ug/L		01/60 - Once Every 2 Months	GR - GRAB
X 01104	Aluminum, total recoverable	1 - Effluent Gross	0		Permit Req.									<=	1010 MAXIMUM	28 - ug/L	1	01/60 - Once Every 2 Months	GR - GRAB
					Value NODI														
					Sample										0.393	19 - mg/L		01/60 - Once Every 2 Months	GR - GRAB
51450	Nitrite Plus Nitrate Total	1 - Effluent Gross	0		Permit Req.									<=	.68 MAXIMUM	19 - mg/L	0	01/60 - Once Every 2 Months	GR - GRAB

### **Submission Note**

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

#### **Edit Check Errors**

	Parameter	Manitoring Logotian	Field	Tuno	Dogarintian	Aaknawladaa
Code	Name	Monitoring Location	Field	Туре	Description	Acknowledge
01045	Iron, total [as Fe]	1 - Effluent Gross	Quality or Concentration Sample Value 3	Soft	The provided sample value is outside the permit limit. (Error Code: 1)	Yes
01090	Zinc, dissolved [as Zn]	1 - Effluent Gross	Quality or Concentration Sample Value 3	Soft	The provided sample value is outside the permit limit. (Error Code: 1)	Yes
01104	Aluminum, total recoverable	1 - Effluent Gross	Quality or Concentration Sample Value 3	Soft	The provided sample value is outside the permit limit. (Error Code: 1)	Yes

#### Comments

LA-UR-19-32649. The average concentration of Al and Fe and Zn are mathematically certain to exceed the benchmark value.

#### **Attachments**

No attachments.

User:

Report Last Saved By

TRIAD NATIONAL SECURITY LLC

User: leslie@lanl.gov Leslie Dale Name: E-Mail: leslie@lanl.gov

Date/Time: 2019-12-19 16:30 (Time Zone: -06:00)

Report Last Signed By

**TERRILLLEMKE** 

E-Mail: tlemke@lanl.gov

Date/Time:

Terrill Lemke Name:

2019-12-19 16:39 (Time Zone: -06:00)

Pern	nit																			
Pern	nit #:	NMR	050013		Permi	ittee:		TRIA	NATIO	NAL SE	CURIT	TY LLC		Facil	ity:	LOS AL	AMOS NA	ATION	IAL LABORATORY	
Majo	or:	No			Permi	ittee Addre	ess:		BOX 1663 ALAMOS					Facil	ity Location:	PO BOX LOS AL		IM 875	545	
Pern	nitted Feature:	074 Exter	nal Outfall		Disch	arge:		<b>074-</b> l	IW aired Wate	r										
Repo	ort Dates & Status				-															
	itoring Period:	From	12/01/18 to 11/3	0/19	DMR	Due Date:		01/3	1/20					Statu	ıs:	NetDMR	Validate	ed		
	siderations for Form				-															
	ly based upon the alter			of April 1	1 through No	vember 30.														
	cipal Executive Office		J	·	J															
	Name:				Title:									Telep	ohone:					
	Name:													' '						
	Data Indicator (NODI)																			
	n NODI:																			
	Parameter		Monitoring Location	Season #	Param. NODI			Quantit	ty or Loadin	g				Quality	y or Concentrat	ion		# of Ex	x. Frequency of Analysis	Sample Type
Code	Name		_				Qualifier 1	Value 1	Qualifier 2	Value 2 U	Jnits Qu	ualifier 1 \	/alue 1 Q	Qualifier 2 V	alue 2 Qualifier	3 Value 3	Units			
						Sample										2.94	28 - ug/L		01/YR - Annual	GR - GRAB
01040	Copper, dissolved [as Cu]		1 - Effluent Gross	0		Permit Req.									<=	7.0 MAXIMUM	28 - ug/L	. 0	01/YR - Annual	GR - GRAB
						Value NODI Sample										728.0	28 - ug/L		01/YR - Annual	GR - GRAB
01104	Aluminum, total recoverable	9	1 - Effluent Gross	0		Permit Req.									<=	1010.0 MAXIMUN			01/YR - Annual	GR - GRAB
	,					Value NODI														
						Sample									<	0.0392	28 - ug/L		01/YR - Annual	GR - GRAB
39516	Polychlorinated biphenyls [F	PCBs]	1 - Effluent Gross	0		Permit Req. Value NODI					-				<=	0.2 MAXIMUM	28 - ug/L	. 0	01/YR - Annual	GR - GRAB
Subi	mission Note					Value NODI														
lf a p	arameter row does not	conta	in any values for t	he Samp	ole nor Efflue	ent Trading,	then none	e of the	following	fields w	ill be s	submitte	d for tha	at row: Uni	ts, Number of	Excursions, Fre	quency o	of Ana	lysis, and Sample Ty	oe.
	Check Errors		,	•		O,			J						•	,			, ,	
	errors.																			
	nments																			
	JR-19-32659. The impa	ired w	ater pollutant total	Araclar	was not deta	acted in sto	rmwater d	ischard	ne from thi	s outfall	theret	fore anni	ıal mon	nitorina will	l he discontini	ied ner Part 6.2	<i>4</i> 1			
	chments	iii Ca W	ator politicalit total	71100101	was not act		illiwator a	iooriare	go nom un	o outiuii	110101			morning will	i bo aloooritiin	ded per i dit e.z.				
	achments.																			
	ort Last Saved By																			
	AD NATIONAL SECUR	ITV I	1.0																	
				nalia @lan	al agu															
User				eslie@lar	_															
Nam				eslie D																
E-Ma				eslie@lar	•															
	/Time:		2	020-01-0	09 09:00 (1	Time Zone:	-06:00)													
	ort Last Signed By																			
User				ERRILLI																
Nam	e:		Т	errill Le	emke															
E-Ma	ail:		tl	emke@la	anl.gov															
Date	/Time:		2	020-01-0	09 13:29 (1	Time Zone:	-06:00)													

	copy of ite	oora																			
Permit																					
Permit	#:	NMR05	0013		Pe	rmittee:		TR	IAD NATI	ONAL S	SECU	RITY LL	C		Facility	y:	LOS	ALAMO	OS NATIOI	NAL LABORATOR	Y
Major:		No			Pe	rmittee Addre	ess:		BOX 166			_			Facility	y Locatio		3OX 16			
								LO	S ALAMC	OS, INIVI	8/54	)					LOS	ALAIVIO	OS, NM 87	545	
Permit	ted Feature:	076 Externa	l Outfall		Dis	scharge:			<b>6-IW</b> paired Wa	iter											
Report	Dates & Status				·																
Monito	ring Period:	From 12	2/01/18 to 1	1/30/19	DN	IR Due Date:		01/	31/20						Status	:	NetI	OMR Va	lidated		
Consid	derations for Forn	n Completio	on		·									,							
Yearly	based upon the alt	ernate moni	itoring seas	on of April 1 t	hrough No	ovember 30.															
Princip	oal Executive Offic	cer																			
First N	ame:				Tit	le:									Teleph	one:					
Last Na	ame:													•							
No Dat	ta Indicator (NODI	I)																			
Form N	NODI:																				
	Parameter	N	Monitoring Lo	cation Season	# Param. N	ODI			ty or Loadi	_						or Concen				of Ex. Frequency of A	nalysis Sample Type
Code	Name					Sample	Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier '	Value 1	Qualifier 2	2 Value 2	Qualifier 3	3 Value 3		Units		
( 01040	Copper, dissolved [as	Cu] 1	- Effluent Gro	ss 0		Permit Req										<=	7.0 MAXIMUM		28 - ug/L	01/YR - Annual	GR - GRAB
						Value NOD											8 - Other (See Co		20/1	O4 MD Annual	CD CDAD
( 01104	Aluminum, total recov	erable 1	- Effluent Gro	ss 0		Sample Permit Req										<=	1490.0 1010.0 MAXIMUM		28 - ug/L 28 - ug/L 1	01/YR - Annual 01/YR - Annual	GR - GRAB GR - GRAB
• • • • • • • • • • • • • • • • • • • •						Value NOD															
9516	Polychlorinated bipher	nvie [PCRe] 1	- Effluent Gro	0 29		Sample Permit Req										< <=	0.0343 0.2 MAXIMUM		28 - ug/L 28 - ug/L 0	01/YR - Annual 01/YR - Annual	GR - GRAB GR - GRAB
3310	1 olychlornated biprici	Tiyio [i Oboj i	Lindon Oic	0		Value NOD										<u></u>	0.2 W/ OXIVIOW		20 ug/L 0	OT/TIC /tillidal	OK OKAD
Submi	ssion Note																				
f a par	ameter row does n	ot contain a	ny values f	or the Sample	nor Efflue	ent Trading, th	en none of	f the fo	ollowing fie	elds will	be s	ubmitted	for that	row: Uni	ts, Num	ber of Ex	cursions, Frequ	ency of	Analysis, a	and Sample Type.	
Edit Cl	heck Errors																				
	Parameter	Monitoring	_																		
Code	Name	Location		Field	Туре									Descript	ion						Acknowledge
	Copper, dissolved	1 - Effluent	Quality	or Concentratio	n Soft	EPΔ's NPDE	S national c	tata eve	stem recon	nizas th	مامی م	cted No F	Data Indi	cator (NO	DI) code	as a reno	orting violation. NF	DES no	rmittees are	responsible for	
	[as Cu]	Gross	Sample	Value 3		ensuring full	compliance	with th	eir permits	, the Cle	an Wa	ater Act, a	and state				rting violation. IVI	БЕО РС	militees are	responsible for	Yes
01104		1 - Effluent Gross	Quality of Sample	or Concentratio Value 3	on Soft	The provided	l sample val	lue is o	utside the	permit lir	mit. (E	rror Code	e: 1)								Yes
Comm	ents																				
	-19-32659. The impinued per Part 6.2.												tal Aroc	lor was n	ot detec	cted in sto	ormwater discha	rge fron	n this outfa	all therefore annual	monitoring will be
Attach			0.0.op.ao.			. с. г. сорро.	. count mac	p. 0	uo.,		<b>-</b>	. 002.									
lo attach																					
Report	Last Saved By																				
TRIAD	NATIONAL SECU	JRITY LLC																			
Jser:				leslie@lai	nl.gov																
Name:				Leslie D	Dale																
E-Mail:				leslie@lai	nl.gov																
Date/Ti	me:			2020-01-0	09 09:00	(Time Zone:	-06:00)														
Report	Last Signed By																				
User:				TERRILL	LEMKE																
Name:				Terrill L	emke																
E-Mail:				tlemke@l	anl.gov																
Date/Ti	me:			2020-01-0	09 13:29	(Time Zone:	-06:00)														

ATTACHMENT 6: ANNUAL REPORTS



#### **Environmental Protection & Compliance Division**

Los Alamos National Laboratory PO Box 1663, K490 Los Alamos, NM 87545 505-667-0666

Symbol: EPC-DO: 19-029

*LAUR*: 19-20724

Date: JAN 3 0 2019

Stormwater Notice Processing Center Mail Code 4203M, ATTN: 2015 MSGP Reports U.S. EPA 1200 Pennsylvania Avenue, NW Washington, DC 20460

Subject: National Pollutant Discharge Elimination System (NPDES) Permit Tracking No. NMR050013, 2018 Multi-Sector General Permit (MSGP) Annual Report for Los Alamos National Laboratory (LANL)

To Whom It May Concern:

Enclosed is the 2018 MSGP Annual Report (Attachment 1) for LANL as required by Part 7.5 of the MSGP.

EPA's Electronic Reporting Rule requires that the Annual Report be submitted using the NeT-MSGP program service on the EPA Central Data Exchange system. However, due to unique conditions related to LANL's monitoring requirements, LANL's NOI was not generated on NeT-MSGP, thus LANL is unable to submit the Annual Report electronically. Correspondence from Nasim Jahan (EPA Region 6) and Emily Hack (NPDES eReporting Help Desk) are included as Attachments 2 and 3, respectively.

Please contact Holly Wheeler at (505) 667-1312 or Terrill Lemke at (505) 665-2397 if you have questions.

Very truly yours,

Terrill W. Lemke

Storm Water Team Leader

TWL/HLW:jdm



Attachment(s): Attachment 1 Annual Report for Stormwater Discharges Associated with Industrial Activity under the NPDES Multi-Sector General Permit Attachment 2 Email correspondence from Nasim Jahan dated 9/26/2018 Attachment 3 Email correspondence from Emily Hack dated 10/26/2018

Copy: Nasim Jahan, USEPA, Region 6, jahan.nasim@epa.gov, (E-File)
Sarah Holcomb, NMED, sarah.holcomb@state.nm.us, (E-File)
Karen E. Armijo, LASO-MA-LS, Karen.armijo@nnsa.doe.gov, (E-File)
Michael W. Hazen, ESHQSS, mhazen@lanl.gov, (E-File)
William R. Mairson, ESHQSS, wrmairson@lanl.gov, (E-File)
Enrique Torres, EPC-DO, etorres@lanl.gov, (E-File)
Taunia Van Valkenburg, EPC-CP, tauniav@lanl.gov, (E-File)
Terrill W. Lemke, EPC-CP, tlemke@lanl.gov, (E-File)
Holly L. Wheeler, EPC-CP, hbenson@lanl.gov, (E-File)
Tim Dolan, GC-ESH, tdolan@lanl.gov, (E-File)
emla.docs@em.doe.gov, (E-File)
locatestream@lanl.gov, (E-File)
epc-correspondence@lanl.gov, (E-File)
adesh-records@lanl.gov, (E-File)



## Annual Report for Stormwater Discharges Associated with Industrial Activity Under the NPDES Multi-Sector General Permit

EPC-DO: 19-029

LA-UR: 19-20724

Date:	JAN 3 0 2019	

NPDES FORM 6100-28



#### United States Environmental Protection Agency Washington, DC 20460

ANNUAL REPORT FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY UNDER THE NPDES THE NPDES MULTI-SECTOR GENERAL PERMIT

Form Approved. OMB No. 2040-0004

2. Provide a summary of your past year's quarterly visual assessment documentation (see Part 3.2.2 of the permit).
3. For any four-sample (minimum) average benchmark monitoring exceedance, if after reviewing the selection, design, installation, and implementation
of your control measures and considering whether any modifications are necessary to meet the effluent limits in the permit, you determine that no further
pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice, provide your rationale for why you believe no further reductions are achievable (see Part 6.2.1.2 of the permit). Enter "NA" if not applicable.
4. Provide a summary of your past year's corrective action documentation (See Part 4.4 of the permit). (Note: If corrective action is not yet completed at the time of submission of this annual report, you must describe the status of any outstanding corrective action(s).) Also describe any incidents of noncompliance in the past year or currently ongoing, or if none, provide a statement that you are in compliance with the permit.

E. Certification I	nformation
designed to assure who manage the and belief, true, as	nalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system e that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge occurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine to knowing violations.
First Name, Middle	e Initial, Last Name:
Title:	
Signature:	
E-mail:	

Table 1. Summary of Inspections and Associated Corrective Actions

Facility	Status	Inspections Conducted Between 11/1/2018 and 1/9/2019	Unauthorized Release or Discharge	Control Measures Needing Maintenance, Repair, or Replacement	Control Measures Inadequate to Meet Non-Numeric Effluent Limitations
TA-3-22 Power and Steam Plant	Active	2	1	3	2
TA-3-29 Indoor TSD	No Exposure	1		_	_
TA-3-29 Machine Shop	No Exposure	1	· <u>-</u>	_	_
TA-3-30 Warehouse	No Exposure	1	1	_	2
TA-3-32 Metal Shop	No Exposure	1	_	_	1
TA-3-34-Metal Shop	No Exposure	1	_	_	_
TA-3-38 Carpenter Shop	Active	2	_	_	_
TA-3-38 Metals Fabrication Shop	Active	2		_	2
TA-3-39 and 102 Metal Shop	No Exposure	1	1	_	2
TA-3-40, Room 131S Machine Shop	No Exposure	1	_	_	1
TA-3-66 Sigma Facility	No Exposure	1	1	_	_
TA-3-2206 Warehouse	No Exposure	1	_	_	_
TA-9-28 Heavy Equipment Maintenance	No Exposure	1	_	_	1
TA-14-23 Burn Cage	No Exposure	1	_	_	_
TA-15-185 Phermex	Inactive	1	_	_	_
TA-15-313 Machine Shop	No Exposure	1	_	_	_
TA-22-52 Machine Shop	No Exposure	1	_	_	1
TA-33-39 Machine Shop	No Exposure	1	_	_	1
TA-33-113 Machine Shop	No Exposure	1	_	_	1
TA-35-2 Machine Shop	No Exposure	1	_	_	_
TA-35-125 Machine Shop	No Exposure	1	_	_	_
TA-35-213 Machine Shop	No Exposure	1		_	_
TA-46-31 Machine Shop	No Exposure	1	_	_	1
TA-46-77	No Exposure	1	_	_	_
TA-48-8 Machine Shop	No Exposure	1	_	_	_
TA-50-54 Machine Shop	No Exposure	1	_	_	_
TA-50-69 WCRRF	No Exposure	1	_	_	_
TA-53-2 Machine Shop	No Exposure	1	_	_	_
TA-53-16/0726 Machine Shop	No Exposure	1	_	_	2
TA-53-26 Machine Shop	No Exposure	1	_	_	2
TA-54-38 Indoor TSD	No Exposure	1	_	_	_
TA-54-38 Outdoor TSD	No Exposure	1	_	_	_
TA-55-3 Metal Shop	No Exposure	1	=	_	_
TA-55-PF-4 Indoor TSD	No Exposure	1	_	_	_
TA-55-5 Warehouse	No Exposure	1	_	_	_
TA-55-268 Warehouse	No Exposure	1	_	_	_
TA-55-314 Warehouse	No Exposure	1	<u> </u>	_	_

Facility	Status	Inspections Conducted Between 11/1/2018 and 1/9/2019	Unauthorized Release or Discharge	Control Measures Needing Maintenance, Repair, or Replacement	Control Measures Inadequate to Meet Non-Numeric Effluent Limitations
TA-55-355	No Exposure	1	_	_	_
TA-55-432	No Exposure	1	_	_	_
TA-55 Outdoor TSD	No Exposure	1	_	_	_
TA-60 Asphalt Batch Plant	Active	2	1	_	1
TA-60 MRF	Active	2	-	_	3
TA-60 Roads and Grounds	Active	2	3	1	3
TA-60-1 Heavy Equipment Yard	Active	2		_	10
TA-60-2 Warehouse	Active	2	1	1	1
TA-63 Transuranic Waste Facility	No Exposure	1		_	_
Totals	46	54	9	5	37

TSD=Treatment, storage and disposal
WCRRF=Waste Characterization, Reduction, and Repackaging Facility
PF = Plutonium Facility
MRF=Material Recycling Facility

**Table 2. Summary of Outstanding Corrective Actions** 

Facility Description	Inspection Date	Inspection Type Description	Finding Description	Problem Description	Corrective Action Description	Completed	Date Corrective Action was Initiated	Expected Completion Date	Corrective Action Completion Date	Description of Noncompliance
TA-60-1 Heavy Equipment Yard	12/19/2018	Routine facility inspection	Control measure inadequate to meet non-numeric effluent limitations	Within the lower east yard at the TA-60-1 Heavy Equipment Yard, leftover ducting and straps were abandoned outside with no controls in place. Housekeeping issue.	Site representative contacted the Electrical Foreman, whom was believed to be responsible for the material on 12/20/2018. However, during a walk down on that date, it was confirmed that he was not responsible for the material. LANL was closed from 12/22/2018 through 1/03/2019. On 1/10/2019, the site representative contacted a member of the sheet metal workers to pick up the material. It was confirmed on 1/28/2019 that the material is under several feet of snow. Sheet metal workers agree to remove the material once it is accessible.	No	12/20/2018	02/28/2019	N/A	Inadequate documentation of requirements in Parts 4.3.1, 4.3.2, and 4.4.
TA-60-1 Heavy Equipment Yard	12/19/2018	Routine facility inspection	Control measure inadequate to meet non-numeric effluent limitations	East of the TA-60-1, in the southern part of the upper yard, several broken solar panels are being stored outside.	Salvage was contacted on 12/19/2018 and 1/15/2019 to determine if they could pick up the panels, but they did not respond. On 1/28/2019, the site representative contacted the Material Recycling Facility (MRF) to determine whether the solar panels could be sent to them. On 1/29/2018 the solar panels were taken to the MRF.	Yes	12/19/2018	N/A	1/29/2019	Inadequate documentation of requirements in Parts 4.3.1, 4.3.2, and 4.4.
TA-60-1 Heavy Equipment Yard	12/19/2018	Routine facility inspection	Control measure inadequate to meet non- numeric	There are several pieces of metal for fabrication and old pieces of equipment that are rusting and not covered.	LANL was closed from 12/22/2018 through 1/03/2019. Starting on 12/26/2018, several snow events occurred. A walk	No	Not documented.	1/31/2019	N/A	Inadequate documentation of requirements in Parts 4.3.1, 4.3.2, and 4.4.

Facility Description	Inspection Date	Inspection Type Description	Finding Description	Problem Description	Corrective Action Description	Completed	Date Corrective Action was Initiated	Expected Completion Date	Corrective Action Completion Date	Description of Noncompliance
			effluent limitations	Specific equipment and locations are as follows: Tail gate and apron in the lower east yard; a rusted metal beam at the same general location; and metal mesh, diamond steel and steel sheets in the central portion of the lower east yard.	down on 1/28/2019 determined the snow melted enough to be place tarps on the identified equipment and metal by 1/31/2019.					
TA-60-1 Heavy Equipment Yard	12/19/2018	Routine facility inspection	Control measure inadequate to meet non-numeric effluent limitations	On the east side of the TA-60-1, Heavy Equipment Yard, tires are being stockpiled outside with no stormwater controls in place.	Tires were transported to MRF where they will be covered, then transported to the Los Alamos County Landfill.	Yes	Not documented.	N/A	1/29/2019	Inadequate documentation of requirements in Parts 4.3.1, 4.3.2, and 4.4.
TA-60-1 Heavy Equipment Yard	12/19/2018	Routine facility inspection	Control measure inadequate to meet non-numeric effluent limitations	At the far northwest corner of the TA-60-1 Heavy Equipment Yard, stormwater is sheet flowing off the asphalt private vehicle parking area and causing erosion to the soil between there and Maniac Road.	Site representative walked down the eroded area with personnel from Roads and Grounds (R&G) on 12/20/2018. R&G will regrade the area and stabilize it with asphalt millings until the area is paved later in the year. LANL was closed from 12/22/2018 through 1/03/2019. Starting on 12/26/2018, several snow events occurred. On 1/11/2019, the Excavation Permit review was completed. The R&G crew is waiting for line locates in the area before they can regrade and stabilize. Work is proposed to be completed by 2/28/2019.	No	12/20/2018	2/28/2019	N/A	Inadequate documentation of requirements in Parts 4.3.1, 4.3.2, and 4.4.
TA-60-1 Heavy Equipment Yard	12/19/2018	Routine facility inspection	Control measure inadequate to meet non- numeric	At several locations within the TA-60-1 Heavy Equipment Yard, either metal storage racks are not covered, the existing covers need to be	LANL was closed from 12/22/2018 through 1/03/2019. Starting on 12/26/2018, several snow events occurred. Tarps will be replaced, resituated or	No	Not documented.	1/31/2019	N/A	Inadequate documentation of requirements in Parts 4.3.1, 4.3.2, and 4.4.

Facility Description	Inspection Date	Inspection Type Description	Finding Description	Problem Description	Corrective Action Description	Completed	Date Corrective Action was Initiated	Expected Completion Date	Corrective Action Completion Date	Description of Noncompliance
			effluent limitations	replaced, or metal is stored near a rack on the ground and needs to be covered. Specific locations include: north of structure TA-60-330; blade storage area on the north side of the lower east yard; far east end of lower east yard; between trailers TA-60-008 and 009; and the west side of TA-60-1 (center area).	installed to cover materials by 1/31/2019.					
TA-60-1 Heavy Equipment Yard	12/19/2018	Routine facility inspection	Control measure inadequate to meet non- numeric effluent limitations	Steel, for fabrication of ladder racks, was stored outside west of TA-60-1 without being covered.	Part of the steel was covered or removed on 12/21/2018.	Yes	Not documented.	N/A	12/21/2018	Inadequate documentation of requirements in Parts 4.3.1, 4.3.2, and 4.4.
TA-60-1 Heavy Equipment Yard	12/19/2018	Routine facility inspection	Control measure inadequate to meet non- numeric effluent limitations	Three roll-off bins were not covered. Two were located in the lower yard and one was in the paved area east of TA-60-1.	The roll-off bin containing metal for recycle was sent to MRF on 12/20/2018. A rental truck was being used at MRF because their regular truck was being repaired. The rental truck was unable to move the wood bin due to its weight. The recycle bin containing wood was taken to MRF on 1/29/2019. Roll-off bins containing tires were sent to MRF on 12/20/2018 and 1/29/2019. The new bin for tires was covered with a tarp on 1/29/2019.	Yes	Not documented.	N/A	1/29/2019	Inadequate documentation of requirements in Parts 4.3.1, 4.3.2, and 4.4.
TA-60 Roads and Grounds	12/17/2018	Routine facility inspection	Control measure inadequate to meet non- numeric effluent limitations	A Hamm roller appears to be abandoned within the Sigma Mesa Staging Area at TA-60 Roads and Grounds east. Liquids have not been drained from the equipment.	On 12/12/2018 a drip pan with spill pads and pillows was placed underneath the Hamm roller to help capture any drips from the small leak. By 1/7/2019, approximately 20 or more inches of leftover snow	Yes	12/17/2018	N/A	1/26/2019	Inadequate documentation of requirements in Part 4.3.2.

Facility Description	Inspection Date	Inspection Type Description	Finding Description	Problem Description	Corrective Action Description	Completed	Date Corrective Action was Initiated	Expected Completion Date	Corrective Action Completion Date	Description of Noncompliance
					from multiple storms that dropped 3 feet of snow by 1/1/2019, impeded access to Hamm roller. On 1/18/2019, during the routine facility inspection, there was no new signs of leakage inside the drip pan underneath the Hamm roller. On 1/26/2019, the motor oil and hydraulic fluids were removed from the Hamm roller.					
TA-60 Asphalt Batch Plant	12/17/2018	Routine facility inspection	Unauthorized release or discharge	At the TA-60 Asphalt Batch Plant, the pump to the heating oil tank is leaking oil.	On 12/11/2017 Roads and Grounds contacted TP Pump out of Albuquerque for a quote on a replacement pump. On 12/17/2018 a new pump was ordered from Honstein Oil & Distribution out of Santa Fe with a 20 day business lead time. On 12/18/2018, the Asphalt Batch Plant was shut down which turns the pump off and stops it from leaking. On 12/20/2018, the soil south of the tank and within the secondary containment basin was cleaned up and the affected area was sprayed with Micro-Blaze. During the routine facility inspection on 1/16/2019, it was determined that power to the Asphalt Batch Plant had not been restored and the pump to the heating oil was not leaking. The new replacement pump is now scheduled to arrive on 2/25/2019. The expected completion date for this corrective action is close of business on 2/28/2019.	No	12/17/2018	2/28/2019	N/A	Inadequate documentation of requirements in Part 4.3.2.

Facility Description	Inspection Date	Inspection Type Description	Finding Description	Problem Description	Corrective Action Description	Completed	Date Corrective Action was Initiated	Expected Completion Date	Corrective Action Completion Date	Description of Noncompliance

Email correspondence from Nasim Jahan dated 9/26/2018

EPC-DO: 19-029

LA-UR: 19-20724

From:

Lemke, Terrill W

To: Subject: Dolan, Timothy Aloysius; Dale, Leslie J; Wheeler, Holly Lynn

Subject Date:

FW: Request for LANL Paper MSGP NOI Waiver Wednesday, September 26, 2018 4:15:53 PM

FYI

Terrill Lemke, PE, CPESC, CISEC Environmental Compliance Programs Los Alamos National Laboratory Los Alamos, NM

Office: 505-665-2397 Cell: 505-699-0725

**From:** Jahan, Nasim < Jahan.Nasim@epa.gov> **Sent:** Wednesday, September 26, 2018 2:43 PM

To: Lemke, Terrill W <tlemke@lanl.gov>

**Cc:** Emily Gorman <emily@avanticorporation.com> **Subject:** RE: Request for LANL Paper MSGP NOI Waiver

Dear Mr. Terrill:

EPA, Region 6 is approving your request for paper submission as the facility is unable to submit the NOI online. Please mail the hardcopies to the following address:

#### For Regular U.S. Mail Delivery:

Stormwater Notice Processing Center
Mail Code 4203M, ATTN: 2015 MSGP Signature Agreement
U.S. EPA
1200 Pennsylvania Avenue, NW
Washington, DC 20460

#### For Overnight/Express U.S. Mail Delivery:

Stormwater Notice Processing Center
William Jefferson Clinton East Building – Room 7420
ATTN: 2015 MSGP Signature Agreement
U.S. EPA
1201 Constitution Avenue, NW
Washington, DC 20004
Thank you,

#### Nasim Jahan

Environmental Engineer Permits and Technical Section (6WQ-PP) EPA Region 6 Water Quality Protection Division 1445 Ross Avenue, Ste. 1200 Dallas, TX 75202-2733 Phone: 214.665.7522 Fax: 214.665.2191

- 1. Part 9.6.2 of the 2015 MSGP, Permit Conditions for the State of New Mexico, requires that benchmark values be modified to reflect New Mexico water quality standards for facilities in New Mexico, based on benchmark values from the Standards for Interstate and Intrastate Surface Waters (20.6.4.900 New Mexico Administrative Code [NMAC]). These modified benchmark values are not recognized by NeT-MSGP and populated in NetDMR.
- 2. The 2018-2020 State of New Mexico Clean Water Act §303(d)/ §305(b) Integrated Report requires monitoring of impaired waters pollutants not available for selection in NeT-MSGP (e.g., Adjusted Gross Alpha and Temperature).
- 3. 20.6.4.900 NMAC requires monitoring of certain modified benchmark and impaired waters metals pollutants as dissolved species, which are not available for selection in NeT-MSGP. Currently, only total metals species may be assigned in NeT-MSGP.
- 4. Due to extended frozen conditions during the winter and a semi-arid climate, Triad will implement an alternative monitoring period of four (4) two-month monitoring quarters for benchmark values as identified below, in accordance with Part 6.1.6 of the 2015 MSGP. This alternate monitoring schedule does not coincide with the default four (4) three-month quarters listed in Part 6.1.7 of the 2015 MSGP and NeT-MSGP does not allow input of an

alternate monitoring schedule. Accordingly, annual impaired waters and Effluent Limitation Guideline monitoring will be conducted between April 1 and November 30 of each year.

April 1 through May 31 June 1 through July 31 August 1 through September 30 October 1 through November 30

These system limitations directly result in inaccurate pollutants, limits, monitoring periods and DMR due dates being populated in NetDMR.

EPA Region 6 has recognized the challenges that the outgoing operator (LANS) has identified with NeT-MSGP related to compliance with Part 9.6.2 of the 2015 MSGP, Permit Conditions for the State of New Mexico, and has been instrumental in helping LANS to resolve these issues. Therefore, per your verbal direction, we are requesting a waiver for Triad to submit a paper NOI in lieu of submitting an inaccurate and incomplete NOI in NeT-MSGP. Please advise at your earliest convenience if you concur with our submittal of a paper NOI, as we must submit by Oct 2.

We appreciate your assistance in helping us maintain compliance. If you have any questions, please contact me at (505) 665-2397.

Terrill

Terrill Lemke, PE, CPESC, CISEC Environmental Compliance Programs Los Alamos National Laboratory Los Alamos, NM Office: 505-665-2397

Cell: 505-699-0725

Email correspondence from Emily Hack dated 10/26/2018

EPC-DO: 19-029

LA-UR: 19-20724

From:

Emily Hack (Avanti) (EPA NeT Support)

Cc: Subject: Jahan Nasim; Wheeler, Holly Lynn; Dale, Leslie J; Hazen, Michael W NMR050013 - Triad National Security LLC - MSGP Notice of Intent

Date:

Friday, October 26, 2018 11:13:07 AM

Attachments:

NMR050013 Triad Los Alamos National Laboratory 2015 MSGP NOI Acknowledgement.pdf

Triad National Security LLC Los Alamos National Laboratory 10-02-2018.pdf

##- Please type your reply above this line -##

You are CC'ed on this support request (10066). Reply to this email to add a comment to the request.

#### Emily Hack (Avanti) (EPA NeT Support)

Oct 26, 13:12 FDT

Good afternoon,

The paper Notice of Intent (NOI) submitted under EPA's Multi-Sector General Permit (MSGP) for Los Alamos National Laboratory under Triad National Security LLC has been processed by the EPA NPDES eReporting Help Desk. The facility was assigned NPDES ID NMR050013. Please, retain the attached acknowledgement letter for your records.

Due to the unique nature of the outfall sequence and monitoring requirements, EPA instructed that we enter the NOI directly into the back-end system. Therefore, the NOI will not be generated in the NeT MSGP program at this time. Attached is the NOI that we received. As I'm sure you are aware, for any changes to the NOI in the future, please submit them via paper as well.

Please, let me know if you have any questions.

Sincerely,

Emily Hack
NPDES eReporting Help Desk
Staffed by Avanti Corporation
1-877-227-8965
NPDESeReporting@epa.gov



**Environmental Protection & Compliance Division** 

Compliance Programs Group PO Box 1663, K490 Los Alamos, New Mexico 87545 505-667-0666

Symbol: EPC-DO: 20-032 LAUR: 20-20880

Date: JAN 2 9 2020

Stormwater Notice Processing Center Mail Code 4203M, ATTN: 2015 MSGP Reports U.S. EPA 1200 Pennsylvania Avenue, NW Washington, DC 20460

Subject: National Pollutant Discharge Elimination System (NPDES) Permit Tracking

No. NMR050013, 2019 Multi-Sector General Permit (MSGP) Annual Report for

Los Alamos National Laboratory (LANL)

To Whom It May Concern:

Enclosed is the 2019 MSGP Annual Report (Attachment 1) submitted by Triad National Security, LLC (Triad) for Los Alamos National Laboratory as required by Part 7.5 of the MSGP.

EPA's Electronic Reporting Rule requires that the Annual Report be submitted using the NeT-MSGP program service on the EPA Central Data Exchange system. However, due to unique conditions related to LANL's monitoring requirements, LANL's NOI was not generated on NeT-MSGP, thus LANL is unable to submit the Annual Report electronically. Correspondence from Nasim Jahan (EPA Region 6) and Emily Hack (NPDES eReporting Help Desk) are included as Attachments 2 and 3, respectively.

Please contact Holly Wheeler at (505) 667-1312 or Terrill Lemke at (505) 665-2397 if you have questions.

Sincerely,

Terrill W. Lemke

Storm Water Team Leader

Du Ale

TWL/HLW:jdm



EPC-DO: 20-032

Stormwater Notice Processing Center

Attachment(s): Attachment 1 National Pollutant Discharge Elimination System (NPDES) Permit Tracking No. NMR050013 Multi-Sector General Permit (MSGP) 2019 Annual Report

Attachment 2 Email correspondence from Nasim Jahan dated 9/26/2018 Attachment 3 Email correspondence from Emily Hack dated 10/26/2018

Copy: Nasim Jahan, USEPA, Region 6, jahan.nasim@epa.gov
Sarah Holcomb, NMED/SWQB, sarah.holcomb@state.nm.us
Karen E. Armijo, NA-LA, Karen.armijo@nnsa.doe.gov
Michael W. Hazen, ALDESHQSS, mhazen@lanl.gov
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Taunia Van Valkenburg, EPC-CP, tauniav@lanl.gov
Terrill W. Lemke, EPC-CP, tlemke@lanl.gov
Holly L. Wheeler, EPC-CP, hbenson@lanl.gov
Tim Dolan, GC-ESH, tdolan@lanl.gov
epccorrespondence@lanl.gov
adesh-records@lanl.gov



# National Pollutant Discharge Elimination System (NPDES) Permit Tracking No. NMR050013 Multi-Sector General Permit (MSGP) 2019 Annual Report

EPC-DO: 20-032

LA-UR-20-20880

JAN 2 9 2020

#### National Pollutant Discharge Elimination System (NPDES) Permit Tracking No. NMR050013

#### Multi-Sector General Permit (MSGP) 2019 Annual Report

1. A summary of routine inspection documentation from January 1, 2019 through December 31, 2019 required in Part 3.1.2.

Los Alamos National Laboratory (LANL), operated by Triad National Security, LLC (Triad), consists of 8 active industrial sites that operate under 6 different Sectors (A, D, N, O, P, and AA). Permit coverage became effective on November 1, 2018. All 8 active sites were inspected according the schedules identified in the site-specific Stormwater Pollution Prevention Plans (SWPPPs). The 37 sites that qualify for a conditional exclusion for no exposure were inspected between January 1, 2019 and December 31, 2019. A summary of inspections/evaluations and associated corrective actions are included in Table 1. An evaluation of analytical monitoring data and summary of results for the 2019 calendar year was conducted on 1/21/2020 and is included in Table 2.

**Table 1. Summary of Inspections and Associated Corrective Actions** 

Facility	Status	Inspections Conducted Between 1/1/2019 and 12/31/2019	Unauthorized Release or Discharge	Control Measures Needing Maintenance, Repairs, or Replacement or Installed Incorrectly	Control Measures Inadequate to Meet Non- Numeric Effluent Limitations	Incidents of Noncompliance (Effluent Limitation Guidelines Exceedances)	Incidents of Noncompliance [New Mexico Water Quality Standard (NM WQS) Exceedances]	Incidents of Noncompliance (Average Exceeds or is Mathematically Certain to Exceed Benchmark Value Modified to Reflect a NM WQS per 2015 MSGP Part 9.6.2.1)	Average Exceeds or is Mathematically Certain to Exceed Benchmark Value	Total Corrective Actions by Facility
TA-3-22 Power and Steam Plant	Active	12	1	13	10	-	5		3	32
TA-3-29 Indoor TSD	No Exposure	1	=	· ·	<del>700</del>	-	****	-	2_	
TA-3-29 Machine Shop	No Exposure	1		=	<del>=</del>	=:		; <del>-</del>	_	200
TA-3-30 Warehouse	No Exposure	1	2	( <del></del>	<del></del>	<del>1</del> 3	-	_	200	2
TA-3-32 Metal Shop	No Exposure	1			-	<del></del> :		-	1011 1011	_
TA-3-34 Metal Shop	No Exposure	1	===	=	<del></del>	<del></del>		-	100	_
TA-3-38 Carpenter Shop	Active	12		1	3	<del>(1-</del> ):	=	-	444	4
TA-3-38 Metals Fabrication Shop	Active	12	2	8	5	: <del>:</del> );	2	_	2	19
TA-3-39 and 102 Metal Shop	No Exposure	1	1	=	11		-	<b>—</b> :	<u> </u>	2
TA-3-40, Room 1315 Machine Shop	No Exposure	1	2-2	-	<del></del>	<del></del>		<del>-</del>	442	-
TA-3-66 Sigma Facility	No Exposure	1	3		2	<del></del>	)( <del></del> )			5
TA-3-2206 Warehouse	No Exposure	1	-	3 <del></del> ;	11	-	13-0-1	-		1
TA-9-28 Heavy Equipment Maintenance	No Exposure	1	1					( <del>-</del> )	_	1
TA-14-23 Burn Cage	No Exposure	1		2-2		<del>-</del>	3 <del>-3</del> 1	; <del>=</del> ).	-	-
TA-15-185 Phermex	No Exposure	1	; <del>=</del> ;		_	-	3 <del></del> 3	-		
TA-15-313 Machine Shop	No Exposure	1	2	===	-	_	<u>→</u>			2
TA-22-52 Machine Shop	No Exposure	1		· ·			· -	-	( <del>=</del>	-
TA-33-39 Machine Shop	No Exposure	1			:=:		-	_	9-4	====

Facility	Status	Inspections Conducted Between 1/1/2019 and 12/31/2019	Unauthorized Release or Discharge	Control Measures Needing Maintenance, Repairs, or Replacement or Installed Incorrectly	Control Measures Inadequate to Meet Non- Numeric Effluent Limitations	Incidents of Noncompliance (Effluent Limitation Guidelines Exceedances)	Incidents of Noncompliance [New Mexico Water Quality Standard (NM WQS) Exceedances]	Incidents of Noncompliance (Average Exceeds or is Mathematically Certain to Exceed Benchmark Value Modified to Reflect a NM WQS per 2015 MSGP Part 9.6.2.1)	Average Exceeds or is Mathematically Certain to Exceed Benchmark Value	Total Corrective Actions by Facility
TA-33-113 Machine Shop	No Exposure	111	-	+	-	_				23 <u>—</u> 2
TA-35-2 Machine Shop	No Exposure	1	-	-		<del></del>	=		<u> </u>	<u></u>
TA-35-125 Machine Shop	No Exposure	11	:—:	-	1 -			\ <u></u>	-	1
TA-46-31 Machine Shop	No Exposure	1	1		1	-		9=	_	2
TA-46-77 Machine Shop	No Exposure	1		+	1	_			-	1
TA-48-8 Machine Shop	No Exposure	11	3-		-	_	1	(A=1)		-
TA-50-54 Machine Shop	No Exposure	1	:		<del>(</del> ):	_	<b>—</b> .	S <del>=</del> 3	-	_
TA-50-69 WCRRF	No Exposure	11	-	-		_	-	-	-	12-21
TA-53-2 Machine Shop	No Exposure	11			1	i—		-	-	1
TA-53-16 Machine Shop	No Exposure	1		***	1		-		_	1
TA-53-26 Machine Shop	No Exposure	1	_	***	1			-	3-8	1
TA-54-38 Indoor TSD	No Exposure	11			-	-		-	<u> </u>	=
TA-54 RANT	No Exposure	1	-				=	-		: <del></del>
TA-55-3 Metal Shop	No Exposure	1	-		1	( <del>-</del> )	-			1
TA-55-PF-4 Indoor TSD	No Exposure	11	-			: <del>-</del> :	_	=		<del>-</del>
TA-55-5 Warehouse	No Exposure	1	1		-	_				1
TA-55-268 Warehouse	No Exposure	1	-		=	-		1445	_	_
TA-55-314 Warehouse	No Exposure	11		-	-	-	_	( <del>***</del> )	<u>-</u>	-
TA-55-355 TSD	No Exposure	1	1	) <del></del>	<del></del>		_	:=:		1
TA-55-432 Warehouse	No Exposure	1	:H:	-	<del>9-</del>	_	-			_
TA-55 Outdoor TSD	No Exposure	1	·—		-					_
TA-60 Asphalt Batch Plant	Active	12	4	1	3	2	<del>1474</del>			10
TA-60 MRF	Active	12	2	5 <del>-4</del>	9		1	( <del>1-1</del> )	-	12
TA-60 Roads and Grounds	Active	12	14	12	24		4	-		54
TA-60-1 Heavy Equipment Yard	Active	12	21	24	14		2	2	1	64
TA-60-2 Warehouse	Active	12	2	4	6		4		533	16
TA-63 Transuranic Waste Facility	No Exposure	1	::	0 <del></del>	****	<del></del> :	104			<del>-</del>
Totals	45	133	58	63	85	2	18	2	6	234

TSD=Treatment, storage and disposal WCRRF=Waste Characterization, Reduction, and Repackaging Facility PF = Plutonium Facility MRF=Material Recycling Facility

**Table 2. Summary of Monitoring Results** 

Permitted Facility	Outfall	Monitoring Type	Pollutant(s)	Monitoring Status	Reason
TA-3-22 Power & Steam Plant	005	Impaired Waters	Total recoverable AI, dissolved Cu	Continued	The pollutant was detected at a concentration that exceeded the Water Quality Standard.
TA-3-22 Power & Steam Plant	005	Impaired Waters	Total Aroclor	Discontinued	Part 6.2.4.1. The pollutant of concern was not detected and not expected to be present in discharge.
TA-3-22 Power & Steam Plant	005	Quarterly Benchmark	Total Fe	Continued	The average concentration of fewer than four quarterly monitoring values is mathematically certain to exceed the benchmark.
TA-3-22 Power & Steam Plant	009	Impaired Waters	Total recoverable Al, dissolved Cu	Continued	The pollutant was detected at a concentration that exceeded the Water Quality Standard.
TA-3-22 Power & Steam Plant	009	Impaired Waters	Total Aroclor	Discontinued	Part 6.2.4.1. The pollutant of concern was not detected and not expected to be present in discharge.
TA-3-22 Power & Steam Plant	009	Quarterly Benchmark	Total Fe	Continued	The average concentration of fewer than four quarterly monitoring values is mathematically certain to exceed the benchmark.
TA-3-22 Power & Steam Plant	012	Impaired Waters	Dissolved Cu	Continued	The pollutant was detected at a concentration that exceeded the Water Quality Standard.
TA-3-22 Power & Steam Plant	012	Impaired Waters	Total recoverable Al, Total Aroclor	Continued	Insufficient volume collected to perform analysis.
TA-3-22 Power & Steam Plant	012	Quarterly Benchmark	Total Fe	Continued	Insufficient volume collected to perform analysis.
TA-3-38 Carpenter Shop	074	Impaired Waters	Total recoverable Al, Dissolved Cu	Continued	The pollutant was detected at a concentration below the Water Quality Standard.
TA-3-38 Carpenter Shop	074	Impaired Waters	Total Aroclor	Discontinued	Part 6.2.4.1. The pollutant of concern was not detected and not expected to be present in discharge.
TA-3-38 Carpenter Shop	073	Impaired Waters	COD, TSS	Discontinued	Per Part 6.2.1.2, the average of four quarterly monitoring values does not exceed the benchmark.
TA-3-38 Metals Fab Shop	002	Impaired Waters	Total recoverable AI, dissolved Cu, Total Aroclor	Discontinued	Due to physical site changes, outfall 002 was replaced by outfall 076 on May 1, 2019, therefore monitoring at outfall 002 is discontinued.
TA-3-38 Metals Fab Shop	002	Quarterly Benchmark	NO3+NO2-N, total recoverable Al, total Fe, dissolved Zn	Discontinued	Due to physical site changes, outfall 002 was replaced by outfall 076 on May 1, 2019, therefore monitoring at outfall 002 is discontinued.
TA-3-38 Metals Fab Shop	076	Impaired Waters	Total recoverable Al	Continued	The pollutant was detected at a concentration that exceeded the Water Quality Standard.
TA-3-38 Metals Fab Shop	076	Impaired Waters	Dissolved Cu	Continued	Dissolved Copper was monitored at outfall 002 prior to being replaced by this outfall. The pollutant was detected at a concentration that exceeded the Water Quality Standard.
TA-3-38 Metals Fab Shop	076	Impaired Waters	Total Aroclor	Discontinued	Part 6.2.4.1. The pollutant of concern was not detected and not expected to be present in discharge.
TA-3-38 Metals Fab Shop	076	Quarterly Benchmark	NO3+NO2-N	Continued	Fewer than four quarterly monitoring values have been collected, however the average does not exceed the benchmark.
TA-3-38 Metals Fab Shop	076	Quarterly Benchmark	Total recoverable Al, total Fe, dissolved Zn	Continued	The average concentration of fewer than four quarterly monitoring values is mathematically certain to exceed the benchmark. Per Part 9.6.2.1, the benchmarks for Al and Zn are modified to reflect the NM WQS.
TA-60 Asphalt Batch Plant	043	Effluent Limitations Guidelines	Oil and Grease	Continued	Monitoring is required annually. The pollutant was not detected.
TA-60 Asphalt Batch Plant	043	Effluent Limitations Guidelines	TSS, pH	Continued	Monitoring is required annually. The pollutant was detected at a concentration that exceeded the daily limit.
TA-60 Asphalt Batch Plant	043	Effluent Limitations Guidelines	TSS	Continued	Monitoring is required annually. The pollutant was detected at a concentration that exceeded the 30-day average limit.
TA-60 Asphalt Batch Plant	043	Impaired Waters	Dissolved Cu, Adjusted Gross Alpha	Continued	The pollutant was detected at a concentration below the Water Quality Standard.
TA-60 Asphalt Batch Plant	043	Impaired Waters	Total Aroclor, total Hg	Discontinued	Per Part 6.2.4.1, the pollutant of concern was not detected and not expected to be present in discharge
TA-60 Asphalt Batch Plant	043	Quarterly Benchmark	TSS	Continued	Fewer than four quarterly monitoring values have been collected, however the average does not exceed the benchmark.
TA-60 MRF	029	Impaired Waters	Dissolved Cu	Continued	The pollutant was detected at a concentration that exceeded the Water Quality Standard.
TA-60 MRF	029	Impaired Waters	Total recoverable Al	Continued	The pollutant was detected at a concentration below the Water Quality Standard.

Permitted Facility	Outfall	Monitoring Type	Pollutant(s)	Monitoring Status	Reason
TA-60 MRF	029	Impaired Waters	Total Aroclor	Discontinued	Per Part 6.2.4.1, the pollutant of concern was not detected and not expected to be present in discharge.
TA-60 Roads and Grounds	031	Impaired Waters	Dissolved Cu, Adjusted Gross Alpha	Continued	The pollutant was detected at a concentration below the Water Quality Standard.
TA-60 Roads and Grounds	031	Impaired Waters	Total Aroclor, total Hg	Discontinued	Per Part 6.2.4.1, the pollutant of concern was not detected and not expected to be present in discharge.
TA-60 Roads and Grounds	032	Impaired Waters	Total recoverable Al	Continued	The pollutant was detected at a concentration that exceeded the Water Quality Standard.
TA-60 Roads and Grounds	032	Impaired Waters	Dissolved Cu	Continued	The pollutant was detected at a concentration below the Water Quality Standard.
TA-60 Roads and Grounds	032	Impaired Waters	Total Aroclor	Discontinued	Per Part 6.2.4.1, the pollutant of concern was not detected and not expected to be present in discharge.
TA-60 Roads and Grounds	037	Impaired Waters	Total recoverable Al	Continued	The pollutant was detected at a concentration that exceeded the Water Quality Standard.
TA-60 Roads and Grounds	037	Impaired Waters	Dissolved Cu	Continued	The pollutant was detected at a concentration below the Water Quality Standard.
TA-60 Roads and Grounds	037	Impaired Waters	Total Aroclor	Discontinued	Per Part 6.2.4.1, the pollutant of concern was not detected and not expected to be present in discharge.
TA-60 Roads and Grounds	039	Impaired Waters	Dissolved Cu	Continued	The pollutant was detected at a concentration that exceeded the Water Quality Standard.
TA-60 Roads and Grounds	039	Impaired Waters	Total Arocior, total recoverable Al	Continued	Insufficient volume collected to perform analysis.
TA-60 Roads and Grounds	042	Impaired Waters	Total recoverable Al	Continued	The pollutant was detected at a concentration that exceeded the Water Quality Standard.
TA-60 Roads and Grounds	042	Impaired Waters	Dissolved Cu	Continued	The pollutant was detected at a concentration below the Water Quality Standard,
TA-60 Roads and Grounds	042	Impaired Waters	Total Aroclor	Discontinued	Per Part 6.2.4.1, the pollutant of concern was not detected and not expected to be present in discharge.
TA-60-1 Heavy Equipment Yard	022	Impaired Waters	Total recoverable Al, dissolved Cu	Continued	The pollutant was detected at a concentration that exceeded the Water Quality Standard.
TA-60-1 Heavy Equipment Yard	022	Impaired Waters	Total Aroclor	Discontinued	Per Part 6.2.4.1, the pollutant of concern was not detected and not expected to be present in discharge.
TA-60-1 Heavy Equipment Yard	022	Quarterly Benchmark	NO3+NO2-N, total recoverable Al, total Fe, dissolved Zn	Continued	The average concentration of fewer than four quarterly monitoring values is mathematically certain to exceed the benchmark. Per Part 9.6.2.1, the benchmarks for Al and Zn are modified to reflect the NM WQS.
TA-60-2 Warehouse	026	Impaired Waters	Total recoverable AI, dissolved Cu	Continued	The pollutant was detected at a concentration that exceeded the Water Quality Standard.
TA-60-2 Warehouse	026	Impaired Waters	Total Aroclor	Discontinued	Per Part 6.2.4.1, the pollutant of concern was not detected and not expected to be present in discharge.
TA-60-2 Warehouse	075	Impaired Waters	Total recoverable AI, dissolved Cu	Continued	The pollutant was detected at a concentration that exceeded the Water Quality Standard.
TA-60-2 Warehouse	075	Impaired Waters	Total Aroclor	Discontinued	Per Part 6.2.4.1, the pollutant of concern was not detected and not expected to be present in discharge.

Al=Aluminum Cu=Copper

COD=Chemical Oxygen Demand

Fe=Iron

NO3+NO2-N=Nitrate-Nitrite as Nitrogen

Hg=Mercury

TSS=Total Suspended Solids

Zn=Zinc

NM WQS= New Mexico Water Quality Standard

MRF=Material Recycling Facility

2. A summary of the past year's quarterly visual assessment documentation (see Part 3.2.2)

A total of 112 visual assessments were completed at 30 different outfalls. Evidence of an oil sheen was observed in two samples: Outfall 002 on 4/23/2019 and and Outfall 074 on 05/10/2019. No other evidence of pollutants were observed.

3. For any four-sample (minimum) average benchmark monitoring exceedance, if after reviewing the selection, design, installation, and implementation of your control measures and considering whether any modifications are necessary to meet the effluent limits in the permit, you determine that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice, your rationale for why you believe no further reductions are achievable.

#### N/A

4. A summary of your past year's corrective action documentation (See Part 4.4). If corrective action is not yet completed at the time of submission of your annual report, you must describe the status of any outstanding corrective actions. Also describe any incidents of noncompliance in the past year or currently ongoing, or if none, provide a statement that you are in compliance with the permit.

Please see Table 1 for a summary of corrective action documentation, which specifies the frequency of each of the following by site: (1) unauthorized release or discharge, (2) control measures needing maintenance, repair or replacement, and (3) control measures that were inadequate to meet the non-numeric effluent limitations. There are no corrective actions not yet completed at the time of annual report submission.

Regarding incidents of noncompliance, 18 monitored constituents from different outfalls exceeded an individual New Mexico Water Quality Standard (NM WQS), 2 monitored quarterly benchmark constituent value exceedances occurred where the benchmark value was modified to reflect a NM WQS per Section 9.6.2.1, and 2 effluent limitation guideline constituent value exceedances occurred as shown in Table 2. Corrective actions to address these exceedances have been completed.

### Email correspondence from Nasim Jahan dated 9/26/2018

EPC-DO: 20-032

LA-UR-20-20880

From: Lemke, Terrill W

To: Dolan, Timothy Aloysius; Dale, Leslie J; Wheeler, Holly Lynn

Subject: FW: Request for LANL Paper MSGP NOI Waiver
Date: Wednesday, September 26, 2018 4:15:53 PM

FYI

Terrill Lemke, PE, CPESC, CISEC Environmental Compliance Programs Los Alamos National Laboratory Los Alamos, NM

Office: 505-665-2397 Cell: 505-699-0725

From: Jahan, Nasim < Jahan. Nasim@epa.gov>
Sent: Wednesday, September 26, 2018 2:43 PM

To: Lemke, Terrill W <tlemke@lanl.gov>

Cc: Emily Gorman <emily@avanticorporation.com>
Subject: RE: Request for LANL Paper MSGP NOI Waiver

Dear Mr. Terrill:

EPA, Region 6 is approving your request for paper submission as the facility is unable to submit the NOI online. Please mail the hardcopies to the following address:

#### For Regular U.S. Mail Delivery:

Stormwater Notice Processing Center
Mail Code 4203M, ATTN: 2015 MSGP Signature Agreement
U.S. EPA
1200 Pennsylvania Avenue, NW
Washington, DC 20460

#### For Overnight/Express U.S. Mail Delivery:

Stormwater Notice Processing Center
William Jefferson Clinton East Building – Room 7420
ATTN: 2015 MSGP Signature Agreement
U.S. EPA
1201 Constitution Avenue, NW
Washington, DC 20004
Thank you,

#### Nasim Jahan

Environmental Engineer Permits and Technical Section (6WQ-PP) EPA Region 6 Water Quality Protection Division 1445 Ross Avenue, Ste. 1200 Dallas, TX 75202-2733 Phone: 214.665.7522 Fax: 214.665.2191

- 1. Part 9.6.2 of the 2015 MSGP, Permit Conditions for the State of New Mexico, requires that benchmark values be modified to reflect New Mexico water quality standards for facilities in New Mexico, based on benchmark values from the Standards for Interstate and Intrastate Surface Waters (20.6.4.900 New Mexico Administrative Code [NMAC]). These modified benchmark values are not recognized by NeT-MSGP and populated in NetDMR.
- 2. The 2018-2020 State of New Mexico Clean Water Act §303(d)/ §305(b) Integrated Report requires monitoring of impaired waters pollutants not available for selection in NeT-MSGP (e.g., Adjusted Gross Alpha and Temperature).
- 3. 20.6.4.900 NMAC requires monitoring of certain modified benchmark and impaired waters metals pollutants as dissolved species, which are not available for selection in NeT-MSGP. Currently, only total metals species may be assigned in NeT-MSGP.
- 4. Due to extended frozen conditions during the winter and a semi-arid climate, Triad will implement an alternative monitoring period of four (4) two-month monitoring quarters for benchmark values as identified below, in accordance with Part 6.1.6 of the 2015 MSGP. This alternate monitoring schedule does not coincide with the default four (4) three-month quarters listed in Part 6.1.7 of the 2015 MSGP and NeT-MSGP does not allow input of an

alternate monitoring schedule. Accordingly, annual impaired waters and Effluent Limitation Guideline monitoring will be conducted between April 1 and November 30 of each year.

April 1 through May 31 June 1 through July 31 August 1 through September 30 October 1 through November 30

These system limitations directly result in inaccurate pollutants, limits, monitoring periods and DMR due dates being populated in NetDMR.

EPA Region 6 has recognized the challenges that the outgoing operator (LANS) has identified with NeT-MSGP related to compliance with Part 9.6.2 of the 2015 MSGP, Permit Conditions for the State of New Mexico, and has been instrumental in helping LANS to resolve these issues. Therefore, per your verbal direction, we are requesting a waiver for Triad to submit a paper NOI in lieu of submitting an inaccurate and incomplete NOI in NeT-MSGP. Please advise at your earliest convenience if you concur with our submittal of a paper NOI, as we must submit by Oct 2.

We appreciate your assistance in helping us maintain compliance. If you have any questions, please contact me at (505) 665-2397.

Terrill

Terrill Lemke, PE, CPESC, CISEC Environmental Compliance Programs Los Alamos National Laboratory Los Alamos, NM Office: 505-665-2397

Cell: 505-699-0725

## Email correspondence from Emily Hack dated 10/26/2018

EPC-DO: 20-032

LA-UR-20-20880

D	
Date:	JAN 2 9 2020
Date.	3AIV Z 3 ZUZII

From:

Emily Hack (Avanti) (EPA NeT Support)

Cc: Subject:

Jahan Nasim; Wheeler, Holly Lynn; Dale, Leslie J; Hazen, Michael W NMR050013 - Triad National Security LLC - MSGP Notice of Intent

Date:

Friday, October 26, 2018 11:13:07 AM

Attachments:

NMR050013 Triad Los Alamos National Laboratory 2015 MSGP NOI Acknowledgement.pdf Triad National Security LLC Los Alamos National Laboratory 10-02-2018.pdf

##- Please type your reply above this line -##

You are CC'ed on this support request (10066). Reply to this email to add a comment to the request.

#### Emily Hack (Avanti) (EPA NeT Support)

Oct 26, 13:12 EDT

Good afternoon,

The paper Notice of Intent (NOI) submitted under EPA's Multi-Sector General Permit (MSGP) for Los Alamos National Laboratory under Triad National Security LLC has been processed by the EPA NPDES eReporting Help Desk. The facility was assigned NPDES ID NMR050013. Please, retain the attached acknowledgement letter for your records.

Due to the unique nature of the outfall sequence and monitoring requirements, EPA instructed that we enter the NOI directly into the back-end system. Therefore, the NOI will not be generated in the NeT MSGP program at this time. Attached is the NOI that we received. As I'm sure you are aware, for any changes to the NOI in the future, please submit them via paper as well.

Please, let me know if you have any questions.

Sincerely,

**Emily Hack** NPDES eReporting Help Desk Staffed by Avanti Corporation 1-877-227-8965 NPDESeReporting@epa.gov

This email is a service from EPA NeT Support. Delivered by Zendesk

ATTACHMENT 7: ROUTINE FACILITY INSPECTIONS

#### Los Alamos National Lab - ADESH

#### Work Order MSGP-RI-63345

MSGP Routine Inspection Printed 11/26/2018 - 5:09 PM

namicha	nce Details				
-	d: 10/29/2018 10:35:36 AM Target: 11/30/20 Priority/Type: Normal / Inspection (EPC-CP-Form- 1020.1) Target: 11/30/20 Priority/Type: Normal / Department: Utilities a	/Inspection		op	
Last PM:	9/27/2018				
Project:	Routine Facility Inspections	Contact: Phone:			
Reason: 2	5346) Unspections Ul 30	118			
Special Ins	structions: NMR053195	10:45 Am			
asks					
# D	Description	Me	eas. No	N/A	Yes
	nformation	1100 = 1	v		
20 D	Describe the weather at time of inspection and document the	e temperature (F°). 40° Clo	udyr		<u> </u>
	e Facility Boundary		ž		
	s the facility free of new discharges of pollutants that have on spection? If "Failed" describe.	occurred since the last		П	
	If "No" has a CAR been previously initiated for this new dis				
	s the facility free of discharge of pollutants at the time of ins				
	s the facility free of evidence of, or the potential for, pollutan ystem. If "No" describe.	its entering the drainage	П	П	
Outfall Ins	spection (identify needed maintenance and repairs, faile	ed control measures that need re	placement,	or a	
	on of corrective actions in relevant task comment)  Ionitored Outfall [073] Free of Evidence of Erosion? If "No	o" dogovika	_	_	
M	Ionitored Outfall [073] Flow Dissipation Devices Operating			<u> </u>	
	escribe.				
M 110 V\	<b>lonitored Outfall [073]</b> Free of Evidence of Pollutants in Di Vater? If "No". describe.	ischarges and/or Receiving			
120 <b>S</b>	ubstantially Identical Outfall [074] Free of Evidence of Er	rosion? If "No", describe.			-
	ubstantially Identical Outfall [074] Flow Dissipation Deviction, describe.	ces Operating Effectively? If			
	ubstantially Identical Outfall [074] Free of Evidence of Pond/or Receiving Water? If "No", describe.	ollutants in Discharges			<u></u>
Control Mo	easures (identify needed maintenance and repairs, faile on of corrective actions in relevant task comments).	ed control measures that need re	placment, or	r a	
A	sphalt Berm [0300503040002] Control Measure is operational escribe condition & need for Maintenance, Repair, or Repla				
Di	ip Rap [0300504060001] Control Measure is operating effe	ectively? If "No" describe		Б	F.
170 cc	ondition & need for Maintenance, Repair, or Replacement. nviroSoxx w/ MetalLoxx [0300503200004] Control Measu				

Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.

Product/chemical storage areas (raw material): controls adequate (appropriate, effective,

Transfer areas for substances in bulk: controls adequate (appropriate, effective, and

200

210

220

operating)? If "No" describe.

and operating)? If "No" describe.

230	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.		П	В	1
240	Industrial processing and finished product storage areas: controls adequate (appropriate effective, and operating)? If "No" describe.				<b>I</b>
250	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		П_		
260	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		Б	<b>F</b> /	П
270	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective and operating)? If "No" describe.	∍,			
280	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	-:-	F		-
290	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			П	r/
300	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? I "No" describe.	f			
310	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		· []	П	
320	Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	<b>F</b>	
330	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.			TV.	
340	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.			Б	
350	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.				
360	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.				
370	Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		. 5	Б	TV
Non-Co	ompliance				
390	Free of incidents of observed non-compliance not already identified above? If "No" describe.		Б	_	
Addition	nal Control Measures		<u> </u>		
410	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.		п	П	E/
	and the state of t	·		<u></u>	19
abor					
<b>Labor</b> Burgin, .	Assigned Work Date	Reg Hrs	OT Hrs	Othe	er Hrs
Burgin, .	Jillian11/1/2018 / 1		-		
ahor R	leport				
dboi i	acport .				
Comple	ted:				
Report:		*			

WO ID: MSOP- RI- 63345Page 2 of 3

Name/Z#: Druian Burgin /211081

Signature (lead inspector): Date and Time: 11 3018
"I confirm the information as recorded is true, accurate and complete."

#### CERTIFICATION STATEMENT

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

(Signatory must meet definition in Section B.11.A, eg., FOD, Ops Mgr, DESH Group Leader, EPC Group Leader)

Print name and title: Russell Stone G-L DOSH-UIS

Signature: 12/14/20/8

### Los Alamos National Lab - ADESH

Target:

**Maintenance Details** 

Requested: 12/17/2018 4:33:24 PM

### Work Order MSGP-RI-63445

MSGP Program

MSGP Routine Inspection Printed 12/17/2018 - 4:43 PM

Proced	ure: MSGP Routine Facility Inspection (EPC-CP-Form- 1020.1)		Normal / Inspection Utilities and Infrastructure	## RG121.9 ## TA-3-38 Car	penter Sho	op	
Last PN	<b>1</b> : 11/30/2018						
Project:	Routine Facility Inspections Dec. 2018 (P-MSGP-RI- 5353)	Inst	18/18	Contact: Phone:			
Reason	: 2018 December Inspections	12	2:40 - 3:00 P	$\sim$			
asks	, t <sub>1</sub> ,						
#	Description			Meas	s. No	N/A	Yes
Weathe	er Information						
20	Describe the weather at time of	nspection and doo	cument the temperature (F°)	1997	C		1
Mithin	*						
AAITLIIL)	the Facility Boundary Is the facility free of new dischar	ges of pollutants ti	hat have occurred since the	last			
40	inspection? If "Failed" describe.	gos or politicants ti	nat have occurred since the	iast			
50	If "No" has a CAR been previo	usly initiated for th	is new discharge?		F	T	T
60	Is the facility free of discharge of			escribe.	Г	T	T
	Is the facility free of evidence of,						
70	system. If "No" describe.						1
100	Monitored Outfall [073] Flow D describe.  Monitored Outfall [073] Free of					1	
110	Water? If "No", describe.						
120	Substantially Identical Outfall						
130	Substantially Identical Outfall "No", describe.					<u></u>	J
140	Substantially Identical Outfall and/or Receiving Water? If "No",		ence of Pollutants in Discha	arges 		<u> </u>	T-
	l Measures (identify needed mai tion of corrective actions in rele			ures that need rep	acment, o	га	
160	Asphalt Berm [0300503040002 describe condition & need for Ma	aintenance, Repair	r, or Replacement.				<b>F</b>
170	Rip Rap [0300504060001] Cont condition & need for Maintenance	e, Repair, or Repla	acement.				T.
180	EnviroSoxx w/ MetalLoxx [030 "No" describe condition & need f			fectively? If	F7		
	ctivity exposed to stormwater (i	dentify needed m	ainteance or a description		ons in rel	evant ta	
200	Material loading/unloading and s	torage areas, com	irois adequate (appropriate,	enective,			
	Material loading/unloading and s and operating)? If "No" describe. Transfer areas for substances in				- 2	Д_,	V
210	and operating)? If "No" describe.  Transfer areas for substances in operating)? If "No" describe.	bulk: controls ade	quate (appropriate, effective	e, and	[]	I.	D D
	and operating)? If "No" describe. Transfer areas for substances in	bulk: controls ade	quate (appropriate, effective	e, and	_ <u>F</u> _ <u>F</u> _ F		

12/31/2018

	and operating)? If "No" describe.				*	
240	Industrial processing and finished product storage area effective, and operating)? If "No" describe.	as: controls ade	quate (appropriate,		V.	
250	Equipment operation and maintenance areas: controls and operating)? If "No" describe.	adequate (appr	opriate, effective,			
260	Fueling areas: controls adequate (appropriate, effective describe.	e, and operating	j)? If "No"			
270	Outdoor vehicle and equipment washing areas: contro and operating)? If "No" describe.	ls adequate (ap	propriate, effective,			г <b>/</b> п
280	Machinery: controls adequate (appropriate, effective, a	and operating)?	If "No" describe.			
290	Waste handling and disposal areas: controls adequate operating)? If "No" describe.	e (appropriate, e	ffective, and			
300	Erodible areas/construction: controls adequate (approprince of the controls adequate)  "No" describe.					
310	Locations and sources of run-on to the site: controls at and operating)? If "No" describe.				3	
320	Non-stormwater/illicit connections: controls adequate ( operating)? If "No" describe.				П	
330	Salt storage piles or pile containing salt: controls adeq operating)? If "No" describe.			,		
340	Dust generation and vehicle tracking: controls adequa operating)? If "No" describe.					
350	Housekeeping (Industrial materials/residues/trash in cadequate (appropriate, effective, and operating)? If "N	o" describe.				
360	Leaks and spills: controls adequate (appropriate, effectives).	ctive, and operat	ing)? If "No"			
370	Sector A [03005-] Wood processing, transport or trea adequate (appropriate, effective, and operating)? If "N		e areas: controls			
Non-Co	ompliance					
390	Free of incidents of observed non-compliance not alre describe.	ady identified at	oove? If "No"			
Additio	nal Control Measures					
410	Are permit requirements satisfied with existing control additional control measures needed.	measure(s)? If '	'No" describe			
Labor						
	-		*			
Labor		Assigned	<b>Work Date</b>	Reg Hrs	OT Hrs	Other Hrs
Burgin,	Jillian	12/17/2018 /	1	_		
Wheele	r, Holly	12/17/2018 /	1			
Labor F	Report					
Comple	eted:					
Report						
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-			79			
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WOID: MS6P-RI-63445 Page 2 of 3

Name/Z#: Tillian Bursin | 211081 for Nolly Wheeler | 118432 Signature (lead inspector): Date and Time: 12 18 18
"I confirm the information as recorded is true, accurate and complete."

3:00 pm

### **CERTIFICATION STATEMENT**

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

(Signatory must meet definition in Section B.11.A, eg., FOD, Ops Mgr, DESH Group Leader, EPC Group Leader)

Print name and title: Russell Stone Grl DESH-UIS

Signature: Russell Stone Date: 1/11/2019

### Los Alamos National Lab - ADESH

### Work Order MSGP-RI-63454

MSGP Routine Inspection Printed 1/15/2019 - 2:22 PM

Maintena	nce Details						
-	d: 1/15/2019 2:09:00 PM e: MSGP Routine Facility Inspection (EPC-CP-Form- 1020.1)	Priority/Type: No	31/2019 ormal / Inspection ilities and Infrastructure	ሷ MSGP Progran 品 RG121.9 ၨ TA-3-38 Carpe		op	
Last PM:	11/30/2018		1 1 -	0.4.4			
Project:	Routine Facility Inspections Jan. 2019 (P-MSGP-RI-	Ins	p. 1/31/19 10:45-11:00	Contact: Phone:			
	5352)	1	D:45-11.00.	منست			
Reason:	MSGP Routine Facility Inspectio	n		н			
asks		,					
# [	Description			Meas.	No	N/A	Yes
Weather I	Information						
20 [	Describe the weather at time of in	spection and docum	nent the temperature (F°)	36° Clean	/_		1
	e Facility Boundary		h	Sun	iney		
	s the facility free of new dischargenspection? If "Failed" describe.	es or pollutants that	nave occurred since the	last	Б		
50	If "No" has a CAR been previou	sly initiated for this r	new discharge?		F	1	F
	s the facility free of discharge of p			escribe.	F		-
I:	s the facility free of evidence of, o		•				
90 N	spection (identify needed main on of corrective actions in releve actions in releve actions in releve of E	vant task comment Evidence of Erosion	r) ? If "No", describe.		.ement,		
100 d	<b>Monitored Outfall [074]</b> Flow Dis lescribe.						Г
110 V	Monitored Outfall [074] Free of E Vater? If "No", describe.						
	Substantially Identical Outfall [0						1
	Substantially Identical Outfall [0 No", describe.	73] Flow Dissipatio	n Devices Operating Effe	ctively? If		1	Г
	Substantially Identical Outfall [0 and/or Receiving Water? If "No", o		ce of Pollutants in Discha	rges			
descriptio	leasures (identify needed main on of corrective actions in relev Asphalt Berm [0300503040002] lescribe condition & need for Main	vant task comment Control Measure is	s). operating effectively? If "l	-		ra	
F	Rip Rap [0300504060001] Contro condition & need for Maintenance	I Measure is operat	ing effectively? If "No" de		п	[·	
E	EnviroSoxx w/ MetalLoxx [03008 No" describe condition & need for	503200004] Control	Measure is operating eff	ectively? If			
	vity exposed to stormwater (ide			of corrective action	ıs in rele	evant t	ask
N	<i>y.</i> /laterial loading/unloading and sto and operating)? If "No" describe.	orage areas: control	s adequate (appropriate,	effective,	. Fi	Г	<b>~</b>
T	ransfer areas for substances in b	ulk: controls adequa	ate (appropriate, effective	, and			<b>F</b>

Product/chemical storage areas (raw material): controls adequate (appropriate, effective,

Liquid tank storage/secondary containment: controls adequate (appropriate, effective,

220

230

and operating)? If "No" describe.

240 250 260 270	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Equipment operation and maintenance areas: controls adequate (appropriate, effective,	
260	Equipment operation and maintenance areas: controls adequate (appropriate, effective,	
260	and operating)? If "No" describe.	
====	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
210	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
280		
	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	
290	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<u> </u>
300	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	
	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	
320	Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe.	
	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	
340	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	
350	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	
	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	
	Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
	al Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.	
abor _abor	Assigned Work Date Reg Hr	rs OT Hrs Other Hr
Burgin, J	•	
ibor Re	port	
complet	ed:	
lenort:		
Report:		
	136P-R1-63454 Page 2 of 3	
	10,000	

"I confirm the information on as recorded is true, accurate and complete."

11:00 AM

### **CERTIFICATION STATEMENT**

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

Print name and title:	Russell Stone	GC	DESK-UIS
Signature: Re-	en Ol Sin	Date; -	2/28/2019

## Los Alamos National Lab - ALDESHQSS

⊫Maintenance Details

and operating)? If "No" describe.

Transfer areas for substances in bulk: controls adequate (appropriate, effective, and

220 230

### Work Order MSGP-RI-63466

MSGP Routine Inspection Printed 2/12/2019 - 9:04 AM

-	d: 2/12/2019 9:00:26 AM e: MSGP Routine Facility Inspection (EPC-CP-Form- 1020.2) 12/18/2018	Target: 2/28/2019 Priority/Type: Normal / Inspection Department: Utilities and Infrastructure	MSGP Program 品 RG121.9 <b>△ TA-3-38 Carpenter Shop</b>
Project:	Routine Facility Inspections Feb. 2019 (P-MSGP-RI- 5354)	Drop. done: 2128/19	Contact: Phone:
Reason:	2019 February Inspections	10:30-10:45	Am
asks			
# [	Description		Meas. No N/A Yes
	Information		
20 [	Describe the weather at time of i	nspection and document the temperature (F°)	15° Plerrr
Within the	e Facility Boundary		
		ges of pollutants that have occurred since the	last
	nspection? If "Failed" describe.	- Later Control of the Control of th	
50 60 I		usly initiated for this new discharge?	and the second s
		pollutants at the time of inspection? If "No" do or the potential for, pollutants entering the dra	
	system. If "No" describe.	or the potential for, pollutarits entering the dia	
N		Evidence of Erosion? If "No", describe. ssipation Devices Operating Effectively? If "N	
		Evidence of Pollutants in Discharges and/or I	Receiving
	Monitored Outfall [074] Free of lescribe.	any unauthorized non-stormwater discharges	
		073] Free of Evidence of Erosion? If "No", de	
140 "	No", describe.	073] Flow Dissipation Devices Operating Effe	
150 a	ind/or Receiving Water? If "No",		
	lischarges? If "No" describe.	073] Free of any unauthorized non-stormwate	er 
descriptio	on of corrective actions in rele	ntenance and repairs, failed control measu vant task comments). Control Measure is operating effectively? If "	
		intenance, Repair, or Replacement.	
<u>190</u>	ondition & need for Maintenance	•	
		B503200004] Control Measure is operating effor Maintenance, Repair, or Replacement.	fectively? If
Area/Acti comment	vity exposed to stormwater (id ).	lentify needed mainteance or a description	n of corrective actions in relevant task

/	operating)? If "No" describe.		
240	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.		
250	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.		
260	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		л г г
270	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
280	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
290	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
300	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.		
310	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
320	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.		
330	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		
340	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.		
350	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.		
360	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.		
370	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.		
380	Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		ппг
Non-Co	mpliance		
400	Free of incidents of observed non-compliance not already identified above? If "No" describe.		
Additio	nal Control Measures		
420	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.		
abor			11111
Labor	Assigned Work Date	Reg Hrs	OT Hrs Other Hrs
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abor R	eport	**************************************	
`	404.		16
	ted:		
Report:			ā.
Political	DEP CISEC 2/28/61		
	Signature / Name Date Will Sam Signature / Name		Date
confirm	Signature / Name Date W: 45 AV Signature / Name n the information as recorded is true, accurate and complete.		Date

(Signatory must meet definition in Section B.11.A, eg. FOD, Ops Mgr, DESH Group Leader, EPC Group Leader)

Print name and title:

| Date: 3/10/2019

**Maintenance Details** 

### Work Order MSGP-RI-63475

MSGP Routine Inspection Printed 2/26/2019 - 12:07 PM

Requeste	ed: 2/26/2019 11:51:43 AM	Target:	3/31/2019	MSGP Progran	n
Procedui	re: MSGP Routine Facility	Priority/Type:	Normal / Inspection	ೄ RG121.9	
	Inspection (EPC-CP-Form- 1020.2)	Department:	Utilities and Infrastructure	🖒 TA-3-38 Carpe	nter Shop
ast PM:	12/18/2018				
roject:	Routine Facility Inspections			Contact:	
	March 2019 (P-MSGP-RI-		10	Phone:	
	5355)	Insp	done:		
leason:	2019 March Inspections	312	9/19 11:10-	11:20 AM	
asks		-			
ASKS					
#	Description			Meas.	No N/A Yes
<b>N</b> eather	Information				
20	Describe the weather at time of in	nspection and do	cument the temperature (F°)	540 Pla	
Vithin th	ne Facility Boundary		1,10		
	Is the facility free of new discharg	ies of pollutants t	that have occurred since the	last	
	inspection? If "Failed" describe.	job or politicanto		Idot	ГГГ
50	If "No" has a CAR been previou	sly initiated for tl	his new discharge?		
30	Is the facility free of discharge of	pollutants at the	time of inspection? If "No" de	escribe.	
	Is the facility free of evidence of,	or the potential for	or, pollutants entering the dra	ninage	
70 :	system. If "No" describe.				
	Monitored Outfall [074] Free of Monitored Outfall [074] Flow Dis			o".	
100	describe.				
110	Monitored Outfall [074] Free of Water? If "No", describe.				
	Monitored Outfall [074] Free of describe.	any unauthorized	d non-stormwater discharges	? If "No"	
130	Substantially Identical Outfall [	073] Free of Evid	dence of Erosion? If "No", de	scribe.	
	Substantially Identical Outfall [ "No", describe.	073] Flow Dissip	ation Devices Operating Effe	ctively? If	
	Substantially Identical Outfall		dence of Pollutants in Discha	rges	
	and/or Receiving Water? If "No", Substantially Identical Outfall [		respective and the second		
	discharges? If "No" describe.	U/3] Free or any	unauthorized non-stormwate	er 	
Control N	Measures (identify needed mair	itenance and re	pairs, failed control measu	res that need replac	ment, or a
lescripti	on of corrective actions in rele	vant task comm	ents).	•	•
	Asphalt Berm [0300503040002]			No"	
	describe condition & need for Mai				
	Rip Rap [0300504060001] Contro condition & need for Maintenance			scribe	
	EnviroSoxx w/ MetalLoxx [0300	<del> </del>		ectively? If	
	'No" describe condition & need fo				
\rea/Acti	ivity exposed to stormwater (id	entify needed m	nainteance or a description	of corrective action	s in relevant task
omment		-	,		
	Material loading/unloading and sto	orage areas: con	trols adequate (appropriate,	effective,	
	and operating)? If "No" describe.				
230 7	Fransfer areas for substances in t	oulk: controls ade	equate (appropriate, effective	. and	

	operating)? If "No" describe.	_	
240	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.	-	
250	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.		
260	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
270	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
280	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
290	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	×	
300	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.		
310	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
320	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.		
330	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		
340	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.		
350	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.		
360	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.		
370	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.		
380	Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
Non-Co	ompliance		
400	Free of incidents of observed non-compliance not already identified above? If "No" describe.		
Additio	nal Control Measures		
400	Are permit requirements satisfied with existing control measure(s)? If "No" describe		
420	additional control measures needed.		
abor			
Labor	Assigned Work Date	Rea Hrs	OT Hrs Other Hrs
Burgin,		itog i no	
rai giri,	2.20.20107 T		
abor R	Report		
abor iv	ac por t		
Comple	eted:		
Report:			
	DEP/		
CM.	musin, CFSEC 3/29/19/11:20		
	Signature / Name Date Signature / Name		Date
confirn	n the information as recorded is true, accurate and complete.		

Print name and title:	Russell Store	Col	DESH-UIS	
Signature: Rus	al Far		Date:	4/9/2019

**Maintenance Details** 

### Work Order MSGP-RI-63540

MSGP Routine Inspection Printed 4/9/2019 - 2:32 PM

Requeste	ed: 4/9/2019 2:07:01 PM	Target:	4/30/2019	MSGP	Program			
rocedur	re: MSGP Routine Facility	Priority/Type:	Normal / Inspection	蟲 RG12	1.9			
	Inspection (EPC-CP-Form- 1020.2)	Department:	Utilities and Infrastructure	: 📤 TA-3-3	38 Carpen	ter Sho	p	
ast PM:	<b>"</b>							
roject:	Routine Facility Inspections			Contact: Phone:				
	April 2019 (P-MSGP-RI- 5361)			i none.				
	· ·	Dr	usp done					
eason:	MSGP Routine Facility Inspectio	n	4/29/19					
			1:20 - 1:	30				
sks								
# [	Description				Mass	N.a.	NI/A	Van
# L	Description				Meas.	No	N/A	Yes
30	Information		5					
20 [	Describe the weather at time of in	spection and do	cument the temperature (F	°). (وا	<u>plc</u>		4	
Vithin th	ne Facility Boundary							
ŀ	Is the facility free of new discharge	es of pollutants t	that have occurred since the	e last				
<u>0 i</u> i	inspection? If "Failed" describe.						-37	
0	If "No" has a CAR been previou	sly initiated for tl	his new discharge?					
0 !	Is the facility free of discharge of p	pollutants at the	time of inspection? If "No" of	describe.			3	_ <u>-</u> -
Į:	Is the facility free of evidence of, or	or the potential fo	or, pollutants entering the d	rainage				
						14	32	
utfall In escription	system. If "No" describe.  spection (identify needed main ion of corrective actions in rele	vant task comm	nent)	sures that nee	ed replace	ement,	ога	
Outfall In lescription	nspection (identify needed main	vant task comm Evidence of Eros	nent) sion? If "No", describe.		ed replace	ement,	ога	
Outfall In lescription	nspection (identify needed main ion of corrective actions in releve Monitored Outfall [074] Free of E Monitored Outfall [074] Flow Dis describe.	vant task comm Evidence of Eros ssipation Devices	nent) sion? If "No", describe. s Operating Effectively? If "	No",	ed replace	ement,	or a	
Outfall In lescription 00 M 00 d	nspection (identify needed main ion of corrective actions in relevant Monitored Outfall [074] Free of E Monitored Outfall [074] Flow Dis describe. Monitored Outfall [074] Free of E Water? If "No", describe.	vant task comments  Evidence of Eroses  Evidence of Pollo  Evidence of Pollo	nent) sion? If "No", describe. s Operating Effectively? If "l utants in Discharges and/or	No", Receiving	ed replace	ment,	<u></u>	
Outfall Inescription  O N  00 O  10 V	nspection (identify needed main ion of corrective actions in relevant Monitored Outfall [074] Free of E Monitored Outfall [074] Flow Dis describe. Monitored Outfall [074] Free of E	vant task comments  Evidence of Eroses  Evidence of Pollo  Evidence of Pollo	nent) sion? If "No", describe. s Operating Effectively? If "l utants in Discharges and/or	No", Receiving	ed replace	ement,	<u></u>	
Outfall Inescription  O M  00 C  10 V  20 C	nspection (identify needed main ion of corrective actions in relevant Monitored Outfall [074] Free of E Monitored Outfall [074] Flow Dis describe. Monitored Outfall [074] Free of E Water? If "No", describe. Monitored Outfall [074] Free of E	vant task commevidence of Erosesipation Devices Evidence of Pollo	nent) sion? If "No", describe. s Operating Effectively? If " utants in Discharges and/or d non-stormwater discharge	No", Receiving	ed replace	ement,	<u></u>	
outfall Incescription  O	nspection (identify needed main ion of corrective actions in relevant Monitored Outfall [074] Free of E Monitored Outfall [074] Free of E Water? If "No", describe. Monitored Outfall [074] Free of E Water? If "No", describe. Monitored Outfall [074] Free of E describe. Substantially Identical Outfall [08]	vant task commevidence of Erosessipation Devices Evidence of Pollulary unauthorized	nent) sion? If "No", describe. s Operating Effectively? If " utants in Discharges and/or d non-stormwater discharge dence of Erosion? If "No", d	No", Receiving es? If "No"	ed replace	ment,	<u></u>	
0 M 00 0 10 V 20 0 30 S	nspection (identify needed main ion of corrective actions in relevant Monitored Outfall [074] Free of E Monitored Outfall [074] Free of E Monitored Outfall [074] Free of E Water? If "No", describe. Monitored Outfall [074] Free of a describe. Substantially Identical Outfall [078] Substantially Identical Outfall [078]	vant task commediate c	nent) sion? If "No", describe. s Operating Effectively? If "I utants in Discharges and/or d non-stormwater discharge dence of Erosion? If "No", d ation Devices Operating Ef	No", Receiving es? If "No" lescribe. fectively? If	ed replace	ement,	<u></u>	
0 M 00 0 10 V 20 0 30 S	nspection (identify needed main ion of corrective actions in relevant Monitored Outfall [074] Free of E Monitored Outfall [074] Free of E Water? If "No", describe. Monitored Outfall [074] Free of E Water? If "No", describe. Monitored Outfall [074] Free of E describe. Substantially Identical Outfall [08]	vant task comments of Eroses in Evidence of Eroses is in Evidence of Pollulary unauthorized [173] Free of Evidence	nent) sion? If "No", describe. s Operating Effectively? If "I utants in Discharges and/or d non-stormwater discharge dence of Erosion? If "No", d ation Devices Operating Ef	No", Receiving es? If "No" lescribe. fectively? If	ed replace	ment,	<u></u>	
0	Inspection (identify needed main ion of corrective actions in relevant monitored Outfall [074] Free of the Monitored Outfall [074] Free of the Monitored Outfall [074] Free of the Water? If "No", describe.  Monitored Outfall [074] Free of the Moni	vant task commediate to session of Evidence of Pollumny unauthorized (173] Free of Evidence of Evidenc	nent) sion? If "No", describe. s Operating Effectively? If "I utants in Discharges and/or d non-stormwater discharge dence of Erosion? If "No", d ation Devices Operating Ef	No", Receiving es? If "No" lescribe. fectively? If	ed replace	ment,	<u></u>	
0	nspection (identify needed main ion of corrective actions in relevant monitored Outfall [074] Free of the Monitored Outfall [074] Free of the Monitored Outfall [074] Free of the Water? If "No", describe.  Monitored Outfall [074] Free of the Monitored Outfall [074] Grant Monitored Outfall [074] Free of the Monitored Outfall [074] Free of the Monitored Outfall [076] Grant Monitored Outfall Grant Monitored Outfall [076] Grant Monitored Outfall	vant task commediate to session of Evidence of Pollumny unauthorized (173] Free of Evidence of Evidenc	nent) sion? If "No", describe. s Operating Effectively? If "I utants in Discharges and/or d non-stormwater discharge dence of Erosion? If "No", d ation Devices Operating Ef	No", Receiving es? If "No" lescribe. fectively? If	ed replace	ment,	<u></u>	
0	Inspection (identify needed main ion of corrective actions in relevant monitored Outfall [074] Free of the Monitored Outfall [074] Free of the Monitored Outfall [074] Free of the Water? If "No", describe.  Monitored Outfall [074] Free of the Moni	vant task commediate c	nent) sion? If "No", describe. s Operating Effectively? If "I utants in Discharges and/or d non-stormwater discharge dence of Erosion? If "No", d ation Devices Operating Ef dence of Pollutants in Disch unauthorized non-stormwa	No", Receiving es? If "No" lescribe. fectively? If narges				
Dutfall Inescription  O	Inspection (identify needed main ion of corrective actions in relevant monitored Outfall [074] Free of the Monitored Outfall [074] Free of the Monitored Outfall [074] Free of the Water? If "No", describe.  Monitored Outfall [074] Free of the Monitored Outfall [075] Free of the Moni	vant task commediate to the commediate the commedia	nent) sion? If "No", describe. s Operating Effectively? If "I utants in Discharges and/or d non-stormwater discharge dence of Erosion? If "No", d ation Devices Operating Ef dence of Pollutants in Disch unauthorized non-stormwa	No", Receiving es? If "No" lescribe. fectively? If narges				
Dutfall Indescription  OO OO  10 V  20 OO  30 S  40 S  60 OO  control N escription	Inspection (identify needed main ion of corrective actions in relevant monitored Outfall [074] Free of Emonitored Outfall [075] Gubstantially Identical Outfall [075] Gu	vant task commediate to session to be vidence of Police existence of Police existence of Police existence of Police existence of Evidence of Evidence of Evidence of Evidence existence ex	nent) sion? If "No", describe. s Operating Effectively? If "I utants in Discharges and/or d non-stormwater discharge dence of Erosion? If "No", d ation Devices Operating Ef dence of Pollutants in Disch unauthorized non-stormwa epairs, failed control measuents). e is operating effectively? If	No", Receiving es? If "No" lescribe. fectively? If narges				
Dutfall Inescription  O	Inspection (identify needed main ion of corrective actions in relevant monitored Outfall [074] Free of the Monitored Outfall [074] Free of the Monitored Outfall [074] Free of the Water? If "No", describe.  Monitored Outfall [074] Free of the Water? If "No", describe.  Monitored Outfall [074] Free of the Monitored Out	vant task commediate to the control Measure ntenance, Repairs	nent) sion? If "No", describe. s Operating Effectively? If "I utants in Discharges and/or d non-stormwater discharge dence of Erosion? If "No", d ation Devices Operating Ef dence of Pollutants in Disch unauthorized non-stormwa epairs, failed control measurents). e is operating effectively? If ir, or Replacement.	No", Receiving es? If "No" lescribe. fectively? If narges ater sures that nee				
Dutfall Incescription  OO OO  10 V  20 OO  30 S  40 S  60 OO  control Mescription  A 80 OO  8	Inspection (identify needed maint ion of corrective actions in relevant monitored Outfall [074] Free of Emonitored Outfall [075] Emoni	vant task commediate to be sipation Devices estimation Devices estimated any unauthorized [argument to be sipation of the sipa	nent) sion? If "No", describe. s Operating Effectively? If "I utants in Discharges and/or d non-stormwater discharge dence of Erosion? If "No", d ation Devices Operating Ef dence of Pollutants in Disch unauthorized non-stormwa unauthorized non-stormwa unauthorized perectively? If ir, or Replacement. erating effectively? If "No" of	No", Receiving es? If "No" lescribe. fectively? If narges ater sures that nee				
Dutfall Included in the control Management of the control Management o	Inspection (identify needed maintion of corrective actions in relevant monitored Outfall [074] Free of the Monitored Outfall [074] Free of the Monitored Outfall [074] Free of the Water? If "No", describe.  Monitored Outfall [074] Free of the Water? If "No", describe.  Monitored Outfall [074] Free of the Monitored Out	vant task commediate to the co	nent) sion? If "No", describe. s Operating Effectively? If "I utants in Discharges and/or d non-stormwater discharge dence of Erosion? If "No", d ation Devices Operating Ef dence of Pollutants in Disch unauthorized non-stormwa	No", Receiving es? If "No" lescribe. fectively? If narges ater "No" describe				
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Dutfall Incescription  OO OO  10 V  20 OO  30 S  40 "  50 a  60 d  control M escription  A  80 d  90 C  rea/Acti	Inspection (identify needed maint ion of corrective actions in relevant monitored Outfall [074] Free of Emonitored Outfall [075] Immediately Imm	vant task commediate to sessipation Devices estipation Devices estipat	nent) sion? If "No", describe. s Operating Effectively? If "I utants in Discharges and/or d non-stormwater discharge dence of Erosion? If "No", d ation Devices Operating Ef dence of Pollutants in Disch unauthorized non-stormwa unauthorized non-stormwa spairs, failed control measurents). e is operating effectively? If ir, or Replacement. erating effectively? If "No" of lacement. introl Measure is operating effectively. Introl Measure or a description	No",  Receiving es? If "No" lescribe. fectively? If marges ater  "No" describe effectively? If	ed replacn	T T T T T T T T T T T T T T T T T T T	T T T T T T T T T T T T T T T T T T T	
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	operating)? If "No" describe.		
240	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.		
250	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.		
260	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
270	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
280	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	c	
290	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u> </u>
300	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.		
310	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
320	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.		
330	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		
340	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	4	
350	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.		
360	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.		
370	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.		
380	Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
Non-Co	ompliance		
400	Free of incidents of observed non-compliance not already identified above? If "No" describe.		
-	onal Control Measures		
420	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.		
abor			
Labor	Assigned Work Date	Rea Hrs	OT Hrs Other Hrs
Burgin,	•		
abor F	Report		
Comple	eted:		×
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TPO	man / J. Burgin 4/29/19		
	Signature / Name Date Signature / Name		Date
confir	m the information as recorded is true, accurate and complete.		X 7

Print name and title:_	Russell Stone	GL DOSH-UT	<u>S</u>
Signature:	lund Som	Date:	5/6/2019

### Work Order MSGP-63655

MSGP Monitoring Stations Printed 5/8/2019 - 11:35 AM

-	sted: 5/8/2019 11:30:22 AM dure: MSGP Routine Facility Inspection (EPC-CP-Form- 1020.2)	Target: 5/31/2019 Priority/Type: Normal / Inspection Department: Utilities and Infrastructure	실 MSGP Program 낢 RG121.9 ﯬ TA-3-38 Carpenter Shop
ast P		_	Contact:
rojec	t: Routine Facility Inspections May 2019 (P-MSGP-RI-	5/22/19	Phone:
	5371)	10:00 - 10:15 AM	
leaso	n: MSGP Routine Facility Inspection	on	
asks			
	-		
#	Description		Meas. No N/A Ye
Veath	er Information		~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
20	Describe the weather at time of in	nspection and document the temperature (F°)	50° PIC 1 1 1
Vithin	the Facility Boundary		
	Is the facility free of new discharg	es of pollutants that have occurred since the	last
10	inspection? If "Failed" describe.		
0		sly initiated for this new discharge?	
٠.	to the feether for a state of the state of		
00		pollutants at the time of inspection? If "No" de	
'0 Outfal	Is the facility free of evidence of, system. If "No" describe.  I Inspection (identify needed main	or the potential for, pollutants entering the dra	ainage
70 Outfal descri	Is the facility free of evidence of, system. If "No" describe.  I Inspection (identify needed mair ption of corrective actions in rele  Monitored Outfall [074] Free of	or the potential for, pollutants entering the dra ntenance and repairs, failed control measu vant task comment) Evidence of Erosion? If "No", describe.	ures that need replacement, or a
70 Outfal descri	Is the facility free of evidence of, system. If "No" describe.  I Inspection (identify needed mair ption of corrective actions in rele  Monitored Outfall [074] Free of	or the potential for, pollutants entering the dra ntenance and repairs, failed control measu vant task comment)	ures that need replacement, or a
70 Outfal descri	Is the facility free of evidence of, system. If "No" describe.  I Inspection (identify needed main ption of corrective actions in relementation of the Monitored Outfall [074] Free of Monitored Outfall [074] Flow Dispective.	or the potential for, pollutants entering the dra ntenance and repairs, failed control measu vant task comment) Evidence of Erosion? If "No", describe.	ures that need replacement, or a
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Material loading/unloading and storage areas: controls adequate (appropriate, effective,

Transfer areas for substances in bulk: controls adequate (appropriate, effective, and

and operating)? If "No" describe.

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Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.  Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.  Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.  Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.  Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and	
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and operating)? If "No" describe.  Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.  Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.  Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.  Leaks and spills; controls adequate (appropriate, effective, and operating)? If "No" describe.  Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Non-Compliance  Free of incidents of observed non-compliance not already identified above? If "No" describe.  Additional Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.  Assigned Work Date Reg Hrs OT Hrs Others (appropriate, Jillian 5/8/2019 / 1	
Operating)? If "No" describe.  Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.  Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.  Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.  Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Non-Compliance  Free of incidents of observed non-compliance not already identified above? If "No" describe additional Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.  Assigned Work Date Reg Hrs OT Hrs Otters (Burgin, Jillian)  Assigned Work Date Reg Hrs OT Hrs Otters (Burgin, Jillian)	ستا
operating)? If "No" describe.  Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.  Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.  Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Non-Compliance  Free of incidents of observed non-compliance not already identified above? If "No" describe.  Additional Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.  Assigned Work Date Reg Hrs OT Hrs Other Regulation, Jillian 5/8/2019 / 1	
adequate (appropriate, effective, and operating)? If "No" describe.  Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.  Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Non-Compliance Free of incidents of observed non-compliance not already identified above? If "No" describe.  Additional Control Measures Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.  Assigned Work Date Reg Hrs OT Hrs Other Regord Work Date Surgin, Jillian 5/8/2019 / 1	<u></u>
Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Non-Compliance Free of incidents of observed non-compliance not already identified above? If "No" describe.  Additional Control Measures Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.  Assigned Work Date Reg Hrs OT Hrs Otte Surgin, Jillian 5/8/2019 / 1	<u></u>
adequate (appropriate, effective, and operating)? If "No" describe.  Free of incidents of observed non-compliance not already identified above? If "No" describe.  Additional Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.  Assigned Work Date Reg Hrs OT Hrs Other Report	T
Free of incidents of observed non-compliance not already identified above? If "No" describe.  Additional Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.  Assigned Work Date Reg Hrs OT Hrs Other Regular Control Measures and the control measures of the	
Free of incidents of observed non-compliance not already identified above? If "No" describe.  Additional Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.  Abor  Assigned Work Date Reg Hrs OT Hrs Other Surgin, Jillian 5/8/2019 / 1	
Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.  Assigned Work Date Reg Hrs OT Hrs Oth 5/8/2019 / 1	
Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.  Assigned Work Date Reg Hrs OT Hrs Oth 5/8/2019 / 1	
Abor  Assigned Work Date Reg Hrs OT Hrs Oth Burgin, Jillian  5/8/2019 / 1	Γυ
Assigned Work Date Reg Hrs OT Hrs Oth 5/8/2019 / 1	
Burgin, Jillian 5/8/2019 / 1	
abor Report	ier Hrs
Completed:	
•	
Report:	
OBusin (CISEC. DEP 5/22/19	
Signature / Name Date Signature / Name Date confirm the information as recorded is true, accurate and complete.	

Print name and	title:	Russell	Stone	66	DESH-	UIS		
Signature:	0						6/11/2017	P
Signature:	1 ces	all of	-			Date:	6/11/00/4	

220

230

and operating)? If "No" describe.

Transfer areas for substances in bulk: controls adequate (appropriate, effective, and

### Work Order MSGP-RI-63715

MSGP Routine Inspection Printed 6/10/2019 - 12:48 PM

Mainten	ance Details		
-	ed: 6/10/2019 12:38:52 PM re: MSGP Routine Facility Inspection (EPC-CP-Form- 1020.2)	Target: 6/28/2019 Priority/Type: Normal / Inspection Department: Utilities and Infrastructure	실 MSGP Program 교급 RG121.9 ம் TA-3-38 Carpenter Shop
Last PM:	4/29/2019		
Project:	Routine Facility Inspections June 2019 (P-MSGP-RI-		Contact: Phone:
<b>D</b>	5377)	Insp done: 11:20-11:30	
Reason:	2019 June Inspections	11:20-11:30	
		6/27/19	
Tasks -			
#	Description		Meas. No N/A Yes
Weather	Information		
20	Describe the weather at time of i	nspection and document the temperature (F°)	740 PC F F
Within th	ne Facility Boundary		
	Is the facility free of new discharg	ges of pollutants that have occurred since the	last
	inspection? If "Failed" describe.		
50		usly initiated for this new discharge?	
		pollutants at the time of inspection? If "No" de	
	Is the facility free of evidence of, system. If "No" describe.	or the potential for, pollutants entering the dra	inage
90	Monitored Outfall [074] Flow Di	evant task comment) Evidence of Erosion? If "No", describe. ssipation Devices Operating Effectively? If "No	<u> Г Г</u>
		Evidence of Pollutants in Discharges and/or F	Receiving
	Water? If "No", describe.  Monitored Outfall [074] Free of	any unauthorized non-stormwater discharges	? If "No"
	describe.	131022	<u></u>
		073] Free of Evidence of Erosion? If "No", des	
140	Substantially identical Outfall [ "No", describe.	[073] Flow Dissipation Devices Operating Effe	ctively? If
	Substantially Identical Outfall [ and/or Receiving Water? If "No",	[073] Free of Evidence of Pollutants in Dischard describe.	rges
	Substantially Identical Outfall [ discharges? If "No" describe.	073] Free of any unauthorized non-stormwate	г
descripti /	on of corrective actions in rele Asphalt Berm [0300503040002]	ntenance and repairs, failed control measure vant task comments).  Control Measure is operating effectively? If "Nintenance, Repair, or Replacement.	
F		ol Measure is operating effectively? If "No" de	scribe
	EnviroSoxx w/ MetalLoxx [0300	p. Nepail, or Replacement. 1503200004] Control Measure is operating effective or Maintenance, Repair, or Replacement.	ectively? If
Area/Acti	ivity exposed to stormwater (id	lentify needed mainteance or a description	of corrective actions in relevant task
comment A	•	orage areas: controls adequate (appropriate,	effective

-	operating)? If "No" describe.	
240	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.	
250	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.	
260	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
270	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
280	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
290	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
300	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	
310	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
320	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	
330	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	
340	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	
350	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	
360	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	
370	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	
380	Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
Non-Co	ompliance	
100	Free of incidents of observed non-compliance not already identified above? If "No" describe.	
A dditi a	nal Control Measures	
420	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.	
abor		
_abor	Work Date Reg	g Hrs OT Hrs Other Hrs
abor R	eport	
Comple	ted:	
Report:		
Mou	ugan/Jillian Burgin 6/27/19	
confirm	Signature / Name Date Signature / Name the information as recorded is true, accurate and complete.	Date

Print name and title: Russell Stone	GL DSH-UT	5
Signature: Ruse Ol For	D	ate: 7/16/2017

### Work Order MSGP-RI-63826

Requested: Procedure: Last PM:	ce Details 7/17/2019 1:12:46 PM MSGP Routine Facility Inspection (EPC-CP-Form- 1020.2)	<b>Target:</b> 7/31/2019					
	1929.21	Priority/Type: Normal / In Department: Utilities and	spection	GP Program 121.9 3-38 Carpenter	Shop		
	5/22/2019						
	Routine Facility Inspections July	Insp. d 7/31/19-1:30-	Contact Phone:	c:			
<b>≺eason:</b> M	ISGP Routine Facility Inspection	7/31/19-1:30-	<b>≥</b> 1:45				
asks				-			
# De	escription			Meas.	No	N/A	Yes
Weather Inf	formation		14				
20 De	escribe the weather at time of inspe	ection and document the tem	perature (F°).	, مه ( ت	T <sub>i</sub>	1	[-
Mithin the I	Facility Boundary						
	Facility Boundary	of pollutants that have accur	rad ainso the last increation?	ıe			
	the facility free of new discharges a ailed" describe.	or pollutants that have occur	red since the last inspection?	IT			
	f "No" has a CAR been previously	initiated for this now dischar					
	<del>.</del>						
	the facility free of discharge of poll						
	the facility free of evidence of, or the of the control or the control of the con	ne potential for, pollutants en	tering the drainage system. If			100	
		(				1.16	
	pection (identify needed mainter		ontrol measures that need re	eplacement, o	r a des	cription	n of
	actions in relevant task commer	•					
90 <u>Mo</u>	onitored Outfall [074] Free of Evid	dence of Erosion? If "No", de	scribe.			-8	
100 Mo	onitored Outfall [074] Flow Dissip	ation Devices Operating Effe	ctively? If "No", describe.			Ţ.	
Мо	onitored Outfall [074] Free of Evid	dence of Pollutants in Discha	rges and/or Receiving Water	? If			
110 "No	o", describe.						
120 <b>Mo</b>	onitored Outfall [074] Free of any	unauthorized non-stormwate	er discharges? If "No" describ	e.			<b></b>
130 <b>Su</b> l	ıbstantially identical Outfall [073	] Free of Evidence of Erosion	n? If "No", describe.				1
Su	bstantially Identical Outfall [073	] Flow Dissipation Devices C	perating Effectively? If "No",				
140 des	scribe.					<u></u>	i
	ibstantially Identical Outfall [073 eceiving Water? If "No", describe.	Free of Evidence of Polluta	nts in Discharges and/or			TES	[-/
	bstantially Identical Outfall [073	I Free of any unauthorized n	on-stormwater discharges? If				2
Sul		Tree or any anadinonzed h			Ţ	<b>I</b>	<u></u>
	o" describe.		introl moscures that need in	eplacment. or	a descr	ription	of
160 "No Control Mea	o" describe. asures (identify needed mainter actions in relevant task commer		milioi measures mai need n			· P······	01
160 "No Control Mea corrective a Asp	asures (identify needed mainter	nts). Introl Measure is operating ef					у. Г-⁄
Control Meacorrective a Asp 180 corrective Rip	asures (identify needed mainter actions in relevant task commen phalt Berm [0300503040002] Co	nts). Introl Measure is operating ef epair, or Replacement. Measure is operating effective	fectively? If "No" describe		<u></u>		5" [-/

Area/Activity exposed to stormwater (identify needed mainteance or a description of corrective actions in relevant task comment). Material loading/unloading and storage areas: controls adequate (appropriate, effective, and 220 operating)? If "No" describe.

Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If 230 "No" describe. Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and

operating)? If "No" describe 240 Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe. 250

Industrial processing and finished product storage areas: controls adequate (appropriate, 260 effective, and operating)? If "No" describe.

270	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
280		
290	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
300	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	
	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If	
310	"No" describe.  Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No"	
320	describe.	
30	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	
340	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	прп
350	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	
	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate	
360	(appropriate, effective, and operating)? If "No" describe	
370	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.  Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate	
088	(appropriate, effective, and operating)? If "No" describe.	
<b>Non-C</b> 100	Compliance  Free of incidents of observed non-compliance not already identified above? If "No" describe.	
dditi	onal Control Measures	
	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional	
120	control measures needed.	
3urgir	n, Jillian 7/17/2019 / 1	
abor	Report	
Comp	eleted:	
Repoi	n:	
11	my DEP CISEC 7/3/19	
confi	Signature / Name Date Signature / Name rm the information as recorded is true, accurate and complete.	Date
-	CERTIFICATION STATEMENT	
wit.	under penalty of law that this document and all attachments were prepared under my direction or s	unarvicion in accordance
	esigned to assure that qualified personnel properly gathered and evaluated the information submitted	
	persons who manage the system, or those persons directly responsible for gathering information, t	
best o	of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penarmation, including the possibility of fine and imprisonment for knowing violations".	
	must meet definition in Section B.11.A, eg. FOD, Ops Mgr, DESH Group Leader, EPC Group Leader)	
	P 20 F	
	$C_{ij} = C_{ij} = C$	
t nam	ne and title: Kussell Stone GL DOSK-UTS  8/8/2013	

Maintenance Details

230

### Work Order MSGP-RI-63906

MSGP Routine Inspection Printed 8/13/2019 - 2:09 PM

Request	ed: 8/13/2019 2:04:18 PM	Target:	8/31/2019	MSG	P Program	ı		
Procedu	re: MSGP Routine Facility Inspection (EPC-CP-Form- 1020.2)		Normal / Inspection Utilities and Infrastructure	🚠 RG1			эp	
Last PM:	6/27/2019							
Project:	Routine Facility Inspections August 2019 (P-MSGP-RI-	Inof	28/19	Contact Phone:	:			
	5393)	8	28/19					
Reason:	2019 August Inspections		15 - 2:30 pm	,				
		∞.	-					
asks								
#	Decarintion				Mono	Ma	NI/A	Vac
	Description				Meas.	No	N/A	Yes
	Information			820	Sunn	_	_	_
20	Describe the weather at time of in	nspection and do	cument the temperature (F-)		Sun	<u> </u>		<u></u>
	ne Facility Boundary							
	Is the facility free of new discharginspection? If "Failed" describe.	ges of pollutants t	hat have occurred since the	last				
40 50	If "No" has a CAR been previou	selv initiated for th	nie new discharge?					_[=
	Is the facility free of discharge of			escribe	-		12	 
	Is the facility free of evidence of,					· ·		
	system. If "No" describe.	or are pererial re	n, penatama entering the are	age				
90	ion of corrective actions in rele Monitored Outfall [074] Free of Monitored Outfall [074] Flow Di	Evidence of Eros	ion? If "No", describe.	0",				P
	describe.							_{-}
110	Monitored Outfall [074] Free of Water? If "No", describe.							P
	Monitored Outfall [074] Free of describe.	any unauthorized	I non-stormwater discharges	? If "No"				F
130	Substantially Identical Outfall [	073] Free of Evid	lence of Erosion? If "No", de	scribe.				-
	Substantially Identical Outfall [ "No", describe.	073] Flow Dissip	ation Devices Operating Effe	ectively? If				
150	Substantially Identical Outfall [ and/or Receiving Water? If "No",	073] Free of Evid describe.	lence of Pollutants in Discha	rges				F
	Substantially Identical Outfall [ discharges? If "No" describe.	073] Free of any	unauthorized non-stormwate	er				4
	Measures (identify needed mail			res that ne	ed replaci	nent, o	ra	
,	on of corrective actions in rele Asphalt Berm [0300503040002]		•	No"				
180	describe condition & need for Ma	intenance, Repai	r, or Replacement.					<u></u>
190	Rip Rap [0300504060001] Contr condition & need for Maintenance	e, Repair, or Repl	acement.					Ţ.
	EnviroSoxx w/ MetalLoxx [0300 "No" describe condition & need fo			ectively? If	- V		П.	F
Area/Act	ivity exposed to stormwater (id	lentify needed n	nainteance or a description	of correc	tive actions	s in rela	evant ta	sk
	<i>.</i> Material loading/unloading and st	orage areas: con	trols adequate (appropriate,	effective,		_	_	_
220	and operating)? If "No" describe.							- 1

Transfer areas for substances in bulk: controls adequate (appropriate, effective, and

	operating)'? If "No" describe.		
240	Product/chemical storage areas (raw material): controls and operating)? If "No" describe.	s adequate (appropriate, effective,	
250	Liquid tank storage/secondary containment: controls ac and operating)? If "No" describe.	dequate (appropriate, effective,	
260	Industrial processing and finished product storage area effective, and operating)? If "No" describe.		
270	Equipment operation and maintenance areas: controls and operating)? If "No" describe.	adequate (appropriate, effective,	
280	Fueling areas: controls adequate (appropriate, effective describe.	e, and operating)? If "No"	
290	Outdoor vehicle and equipment washing areas: control and operating)? If "No" describe.	ls adequate (appropriate, effective,	
300	Machinery: controls adequate (appropriate, effective, a	nd operating)? If "No" describe.	
310	Waste handling and disposal areas: controls adequate operating)? If "No" describe.	(appropriate, effective, and	
320	Erodible areas/construction: controls adequate (appropusor) describe.	oriate, effective, and operating)? If	
330	Locations and sources of run-on to the site: controls ac and operating)? If "No" describe.	dequate (appropriate, effective,	
340	Salt storage piles or pile containing salt: controls adequoperating)? If "No" describe:	uate (appropriate, effective, and	
350	Dust generation and vehicle tracking: controls adequat operating)? If "No" describe.	e (appropriate, effective, and	
360	Housekeeping (Industrial materials/residues/trash in coadequate (appropriate, effective, and operating)? If "No		
370	Leaks and spills: controls adequate (appropriate, effect describe.	tive, and operating)? If "No"	
380	Sector A [03005-] Wood processing, transport or treat adequate (appropriate, effective, and operating)? If "No		
Non Co	mpliance		
400	Free of incidents of observed non-compliance not alread describe.	ady identified above? If "No"	
		5	
Addition 420	nal Control Measures  Are permit requirements satisfied with existing control additional control measures needed.	measure(s)? If "No" describe	
.abor Labor Burgin,	Jillian	<b>Assigned</b> Work Date 8/13/2019 / 1	Reg Hrs OT Hrs Other Hrs
abor R	ерогт	The state of the s	
Comple	ted:		
Report:			
	of and along		
	Signature / Name Date  on the information as recorded is true, accurate and of	Signature / Name	Date

Print name and title:	Russell Jones	GL	DESH-UIS	
Signature:	und Fr		Date: 9/5/2619	

### Work Order MSGP-RI-63942

#### Los Alamos National Laboratory MSGP Routine Inspection Printed 9/13/2019 - 3:29 PM **Maintenance Details** Requested: 9/13/2019 3:21:09 PM Target: 9/30/2019 MSGP Program **Procedure:** MSGP Routine Facility Priority/Type: Normal / Inspection 品 RG121.9 Inspection (EPC-CP-Form-**Department:** Utilities and Infrastructure A TA-3-38 Carpenter Shop 1020.2) Last PM: 7/31/2019 Contact: Project: Routine Facility Inspections Phone: September 2019 (P-MSGP-RI-5401) 12:30-12:45 Reason: 2019 September Inspections **Tasks** Description Meas. N/A Yes Weather Information 75° PC > 1 Describe the weather at time of inspection and document the temperature (F°), Within the Facility Boundary Is the facility free of new discharges of pollutants that have occurred since the last inspection? If 40 "Failed" describe 50 If "No" has a CAR been previously initiated for this new discharge? 60 Is the facility free of discharge of pollutants at the time of inspection? If "No" describe. Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If 70 "No" describe, Outfall Inspection (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comment) Monitored Outfall [074] Free of Evidence of Erosion? If "No", describe, Monitored Outfall [074] Flow Dissipation Devices Operating Effectively? If "No", describe, Monitored Outfall [074] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If 110 "No", describe 120 Monitored Outfall [074] Free of any unauthorized non-stormwater discharges? If "No" describe. Substantially Identical Outfall [073] Free of Evidence of Erosion? If "No", describe. 130 Substantially Identical Outfall [073] Flow Dissipation Devices Operating Effectively? If "No", 140 describe.

Control Measures (identify needed maintenance and repairs, failed control measures that need replacment, or a description of corrective actions in relevant task comments).

Substantially Identical Outfall [073] Free of Evidence of Pollutants in Discharges and/or

Substantially Identical Outfall [073] Free of any unauthorized non-stormwater discharges? If

150

160

260

Receiving Water? If "No", describe.

effective, and operating)? If "No" describe.

"No" describe.

Asphalt Berm [0300503040002] Control Measure is operating effectively? If "No" describe 180 condition & need for Maintenance, Repair, or Replacement. Rip Rap [0300504060001] Control Measure is operating effectively? If "No" describe condition & 190 need for Maintenance, Repair, or Replacement. EnviroSoxx w/ MetalLoxx [0300503200004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement. Replaced wlo 200

Area/Activity exposed to stormwater (identify needed mainteance or a description of corrective actions in relevant task comment). Material loading/unloading and storage areas: controls adequate (appropriate, effective, and

220 operating)? If "No" describe. Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If 230 "No" describe.

Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and 240 operating)? If "No" describe. Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and

250 operating)? If "No" describe. Industrial processing and finished product storage areas: controls adequate (appropriate,

270	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
280	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
290	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
300	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.		
	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If		
310	"No" describe.		
320	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.		
330	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		
340	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.		
350	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If"No" describe.		
360	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.		
370	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.		
380	Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
Non C	Compliance		
1001-C	Free of incidents of observed non-compliance not already identified above? If "No" describe.		
	onal Control Measures		
abor- Labor	3	Reg Hrs	OT Hrs Other Hrs
Burgin	n, Jillian 9/13/2019 / 1		
	Report		
JB1	Signature / Name		Date
	CERTIFICATION STATEMENT		

Print name and title:	Sussell Store	BGL DESH-UTS	
Signature: 7	en al Fr	Date: 10/3/	12019

### Work Order MSGP-RI-64028

MSGP Routine Inspection Printed 10/14/2019 - 4:43 PM

лаıntena	nce Details					
Requeste	d: 10/14/2019 4:41:45 PM	<b>Target:</b> 10/31/2019	MSGP Program			
rocedure	: MSGP Routine Facility Inspection (EPC-CP-Form- 1020.2)	Priority/Type: Normal / Inspection  Department: Utilities and Infrastructure	器 RG121.9 ♣ TA-3-38 Carpenter	Shop		
.ast PM:	9/30/2019					
Project:	Routine Facility Inspections October 2019 (P-MSGP-RI- 5410)	Anse Done	Contact: Phone:			
Reason:	2019 October Inspections	Insp Done				
		₩ jb 12:00	0-12:15			
asks						
# [	Description		Meas.	No	N/A	Yes
	nformation		- 2 6			
20 [	Describe the weather at time of ins	pection and document the temperature (F°).	51° Sunnu	L		_r
Within the	e Facility Boundary					
		s of pollutants that have occurred since the last	inspection? If		_	
<u>40                                    </u>	Failed" describe.	ly initiated for this pay discharge?		౼		
		ly initiated for this new discharge? ollutants at the time of inspection? If "No" descrit		늗		_
		the potential for, pollutants entering the drainag				-
	escribe.	the potential for, politically effecting the draining	e system, ii 110	<b>F</b> 3	13	Г
90 <u>N</u>		vidence of Erosion? If "No", describe. ipation Devices Operating Effectively? If "No", d	escribe			-
N		vidence of Pollutants in Discharges and/or Rece				
		ny unauthorized non-stormwater discharges? If "	No" describe.			
		73] Free of Evidence of Erosion? If "No", describ				T-
	ubstantially Identical Outfall [0] escribe.	73] Flow Dissipation Devices Operating Effective	ly? If "No",	П		
	ubstantially Identical Outfall [0] leceiving Water? If "No", describe	73] Free of Evidence of Pollutants in Discharges	and/or			T-
	ubstantially Identical Outfall [0] escribe.	73] Free of any unauthorized non-stormwater dis	charges? If "No"		П	Tu-
	easures (identify needed maint actions in relevant task comm	enance and repairs, failed control measures tents).	that need replacment, or a	descri	ption o	f
		control Measure is operating effectively? If "No" o	describe			
	ondition & need for Maintenance,					شا
	ip Rap [0300504060001] Control eed for Maintenance, Repair, or R	Measure is operating effectively? If "No" describe the placement.	e condition &	i i		Į.
	nviroSoxx w/ MetalLoxx [03005 escribe condition & need for Main	<b>03200005]</b> Control Measure is operating effectiv tenance, Repair, or Replacement.	ely? If "No"			
Area/Activ	/ity exposed to stormwater (ide	ntify needed mainteance or a description of c	orrective actions in releva	nt tack	comm	ent)
M		rage areas: controls adequate (appropriate, effec		task		- T
T		ılk: controls adequate (appropriate, effective, and	d operating)? If			
P	roduct/chemical storage areas (ra	w material): controls adequate (appropriate, effe	ctive, and			

Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and

Industrial processing and finished product storage areas: controls adequate (appropriate, effective,

250

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operating)? If "No" describe.

and operating)? If "No" describe.

	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			
<del>280 -</del>	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		-	<u></u>
	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and			
290	operating)? If "No" describe		1	
300	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.			JV
310	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If	Tab.		
320	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.			J.
330	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	. IU		
340	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)?  If "No" describe.			
350	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.			
	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate	SE	Fer	reel
360	(appropriate, effective, and operating)? If "No" describe.			
370	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.			
380	Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<u>. II</u>	-6	1
Non-C	ompliance			
400	Free of incidents of observed non-compliance not already identified above? If "No" describe.			
Additi	onal Control Measures			
	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional			
420	control measures needed.		工	
. <b>abor</b> Burgin	<b>.</b>	OTH	5 Util	ei nis
	Report  leted: t:  www.lt.Burgin wlaalig			
Compl	Report leted: t:		Date	
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confir ertify uem des	Report    Signature / Name	on my a	cordanc inquiry ubmitte	of the
confirentify used on or post of informatory materials.	Report    Signature / Name   Date   Signature / Name   Date   Signature / Name   Date   Date	on my a	cordanc inquiry ubmitte	of the

#### Work Order MSGP-RI-64112 Los Alamos National Laboratory MSGP Routine Inspection Printed 11/21/2019 - 2:53 PM **Maintenance Details** Requested: 11/21/2019 2:47:58 PM **Target:** 11/30/2019 MSGP Program 品 RG121.9 **Procedure:** MSGP Routine Facility Priority/Type: Normal / Inspection Inspection (EPC-CP-Form-**Department:** Utilities and Infrastructure ATA-3-38 Carpenter Shop 1020.2) Last PM: 9/30/2019 Contact: **Project:** Routine Facility Inspections Insp done Phone: November 2019 (P-MSGP-11/20/19 RI-5418) Reason: 2019 November Inspections 12:45 - 1:00 **Tasks** Description Meas. No N/A Yes Weather Information 45° cloudy Describe the weather at time of inspection and document the temperature (F°) Within the Facility Boundary Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe. 40 50 If "No" has a CAR been previously initiated for this new discharge? 60 Is the facility free of discharge of pollutants at the time of inspection? If "No" describe. Is the facility free of evidence of, or the potential for, pollutants entering the drainage 70 system. If "No" describe. Outfall Inspection (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comment) Monitored Outfall [074] Free of Evidence of Erosion? If "No", describe. Monitored Outfall [074] Flow Dissipation Devices Operating Effectively? If "No", describe. 100 Monitored Outfall [074] Free of Evidence of Pollutants in Discharges and/or Receiving 110 Water? If "No", describe. Monitored Outfall [074] Free of any unauthorized non-stormwater discharges? If "No" 120 130 Substantially Identical Outfall [073] Free of Evidence of Erosion? If "No", describe, Substantially Identical Outfall [073] Flow Dissipation Devices Operating Effectively? If "No", describe. 140 Substantially Identical Outfall [073] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe. 150

Control Measures (identify needed maintenance and repairs, failed control measures that need replacment, or a description of corrective actions in relevant task comments).

Substantially Identical Outfall [073] Free of any unauthorized non-stormwater

160

discharges? If "No" describe.

Asphalt Berm [0300503040002] Control Measure is operating effectively? If "No"

describe condition & need for Maintenance, Repair, or Replacement.

Rip Rap [0300504060001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.

EnviroSoxx w/ MetalLoxx [0300503200005] Control Measure is operating effectively? If

200 "No" describe condition & need for Maintenance, Repair, or Replacement.

Area/Activity exposed to stormwater (identify needed mainteance or a description of corrective actions in relevant task

Area/Activity exposed to stormwater (identify needed mainteance or a description of corrective actions in relevant task comment).

Material loading/unloading and storage areas: controls adequate (appropriate, effective,

220 and operating)? If "No" describe.

230 Transfer areas for substances in bulk: controls adequate (appropriate, effective, and

Confirm	Signature / Name Date Signature / Name n the information as recorded is true, accurate and complete.	Date
Report:		
Comple	ted:	
Labor R	Report	
Burgin,	Jillian 11/30/2019 / 1	
Labor	Assigned Work Date	Reg Hrs OT Hrs Other Hrs
 Labor		
420	additional control measures needed.	
	nal Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe	
400	Free of incidents of observed non-compliance not already identified above? If "No" describe.	
	ompliance	
380	Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
370	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	
360	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	
350	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	
340	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	
330	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	
320	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	
310	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
290 300	and operating)? If "No" describe.  Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	
280	describe.  Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective,	
270	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Fueling areas: controls adequate (appropriate, effective, and operating)? If "No"	
260	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
250	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.	
240	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.	
	operating)? If "No" describe.	

Print name and title:	Plussell Ston	e GC	DESH-UIS	
Signature:	nel Fo		Date: 12/4/2019	E.

260

effective, and operating)? If "No" describe.

MSGP Routine Inspection

#### Work Order MSGP-RI-64123 Los Alamos National Laboratory Printed 12/10/2019 - 10:01 AM **Maintenance Details** Requested: 12/10/2019 9:56:36 AM 12/31/2019 MSGP Program Procedure: MSGP Routine Facility Priority/Type: Normal / Inspection Inspection (EPC-CP-Form-**Department:** Utilities and Infrastructure TA-3-38 Carpenter Shop 1020.2) Last PM: 11/20/2019 Contact: Project: Routine Facility Inspections Phone: December 2019 (P-MSGP-RI-5424) Reason: 2019 December Inspections Tasks Description Meas. No Weather Information Describe the weather at time of inspection and document the temperature (F°) Within the Facility Boundary Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe. 50 If "No" has a CAR been previously initiated for this new discharge? 60 Is the facility free of discharge of pollutants at the time of inspection? If "No" describe, Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If

70 "No" describe. Outfall Inspection (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comment) Monitored Outfall [074] Free of Evidence of Erosion? If "No", describe. 100 Monitored Outfall [074] Flow Dissipation Devices Operating Effectively? If "No", describe, Monitored Outfall [074] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If 110 "No", describe. 120 Monitored Outfall [074] Free of any unauthorized non-stormwater discharges? If "No" describe Substantially Identical Outfall [073] Free of Evidence of Erosion? If "No", describe. 130 Substantially Identical Outfall [073] Flow Dissipation Devices Operating Effectively? If "No". 140 Substantially Identical Outfall [073] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe. 150 Substantially Identical Outfall [073] Free of any unauthorized non-stormwater discharges? If 160 "No" describe. Control Measures (identify needed maintenance and repairs, failed control measures that need replacment, or a description of corrective actions in relevant task comments). Asphalt Berm [0300503040002] Control Measure is operating effectively? If "No" describe 180 condition & need for Maintenance, Repair, or Replacement. Rip Rap [0300504060001] Control Measure is operating effectively? If "No" describe condition & 190 need for Maintenance, Repair, or Replacement. EnviroSoxx w/ MetalLoxx [0300503200005] Control Measure is operating effectively? If "No" 200 describe condition & need for Maintenance, Repair, or Replacement. Area/Activity exposed to stormwater (identify needed mainteance or a description of corrective actions in relevant task comment) Material loading/unloading and storage areas: controls adequate (appropriate, effective, and 220 operating)? If "No" describe. Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If 230 "No" describe: Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and 240 operating)? If "No" describe. Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and 250 operating)? If "No" describe. Industrial processing and finished product storage areas: controls adequate (appropriate,

270	Equipment operation and maintenance areas: controls ad operating)? If "No" describe.	(		
280	Fueling areas: controls adequate (appropriate, effective, a			
90	Outdoor vehicle and equipment washing areas: controls a operating)? If "No" describe.	adequate (appropriate, effective, and		
00	Machinery: controls adequate (appropriate, effective, and			
10	Waste handling and disposal areas: controls adequate (a "No" describe. Was Vin Was Un COVERD	ppropriate, effective, and operating)? If		<u> </u>
20	Erodible areas/construction: controls adequate (appropriadescribe.	ate, effective, and operating)? If "No"		
30	Locations and sources of run-on to the site: controls adeq operating)? If "No" describe.	quate (appropriate, effective, and		
340	Salt storage piles or pile containing salt: controls adequat operating)? If "No" describe.	e (appropriate, effective, and		
350	Dust generation and vehicle tracking: controls adequate ( "No" describe.	appropriate, effective, and operating)? If		
360	Housekeeping (Industrial materials/residues/trash in contagonal (appropriate, effective, and operating)? If "No" describe.	act with stormwater): controls adequate		
370	Leaks and spills: controls adequate (appropriate, effective	e, and operating)? If "No" describe,		
80	Sector A [03005-] Wood processing, transport or treated (appropriate, effective, and operating)? If "No" describe.	wood storage areas: controls adequate		ГГР
Ion-C	ompliance			
00	Free of incidents of observed non-compliance not already	identified above? If "No" describe.		
bor abor		Applicated Moule Date	Don Uro	OT the Other than
	o, Marwin	Assigned Work Date 12/10/2019 / 1	Keg nrs	OT Hrs Other Hrs
omple eport				
confirm	Signature / Name  m the information as recorded is true, accurate and com	Signature / Name		Date
	CERTIFICAT	TION STATEMENT		

Print name and title:	Russell	Stone	GC	DESH-LOTS
Signature: Re	well St	_		Date: 1/8/2020

## Los Alamos National Lab - ADESH

**Maintenance Details** 

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operating)? If "No" describe.

### Work Order MSGP-RI-63346

MSGP Routine Inspection Printed 11/26/2018 - 5:09 PM

Requested	I: 11/6/2018 2:36:00 PM	Target:	11/30/2018	≟ MSGP	Program			
Procedure	: MSGP Routine Facility	Priority/Type:	/ Inspection	品 RG121				
	Inspection (EPC-CP-Form- 1020.1)	Department:	Utilities and Infrastructure	ம் TA-3-3		ab Sh	юр	
ast PM:	9/27/2018							
Project:	Routine Facility Inspections			Contact:				
. 0,001.	Nov. 2018 (P-MSGP-RI-	0	LO dano	Phone:				
	5346)	- w	sp. core					
् Reason: 2	2018 November Inspections		sp. done					
Special Ins	structions: NMR053195	(	0:45-11:00	AM				
asks								
# D	escription				Meas.	No	N/A	Yes
<b>Veather Ir</b>	nformation							
20 D	escribe the weather at time of i	nspection and do	cument the temperature (F°).	400	Cloud	4		
		<u> </u>	, , , , , , , , , , , , , , , , , , , ,			<del>)</del>		
	Facility Boundary							
	the facility free of new discharg spection? If "Failed" describe.	ges of pollutants t	that have occurred since the	last		_		-
		ralis initiated for th	his many disabassa 0					1
	If "No" has a CAR been previou					-		
	the facility free of discharge of			CALIFORNIA DE LA CALIFO				
	the facility free of evidence of, /stem. If "No" describe.	or the potential fo	or, pollutants entering the dra	inage		-	_	· James
=	n of corrective actions in rele onitored Outfall [002] Free of		•			П	П	T
	onitored Outfall [002] Flow Di			o".				
	escribe.						ш	T
	onitored Outfall [002] Free of	Evidence of Pollu	utants in Discharges and/or R	Receiving				
110 W	/ater? If "No", describe.						ᅳᅳ	Tu
Control Me lescription	easures (identify needed main n of corrective actions in rele	ntenance and re	pairs, failed control measu lents).	res that nee	d replacm	ent, o	ra	
	sphalt Berm [0300103040009]			No"				
30 de	escribe condition & need for Ma	intenance, Repai	r, or Replacement.					_[
	sphalt Berm [0300103040010]			No"				
	escribe condition & need for Ma					1		
	ase Course Berm [030010302 escribe condition & need for Ma			? If "No"		_	_	_
			·					
	rop Inlet with Petro-Plug [030 "No" describe condition & need			ectively?			-	_
	nviroSoxx w/ MetalLoxx [0300			actively? If				با ا
	lo" describe condition & need for			ouvery ( II				T
	nviroSoxx w/ MetalLoxx [0300			ectively? If		-		
80 "N	lo" describe condition & need for	or Maintenance, F	Repair, or Replacement.		6.1	Г	Г	T
Area/Activi comment).	ity exposed to stormwater (id	lentify needed m	nainteance or a description	of correctiv	e actions	in rele	evant t	ask
•	aterial loading/unloading and st	orane areas: con	trole adequate (appropriato	affective				
	nd operating)? If "No" describe.	orage areas. con	uois aucquate (appropriate, t	SHECHVE,				T
	ansfer areas for substances in	L						10

Product/chemical storage areas (raw material): controls adequate (appropriate, effective,

0.40	Industrial processing and finished product storage areas: contro	ols adequate (appropriate	
240	effective, and operating)? If "No" describe.  Equipment operation and maintenance areas: controls adequate	te (annronriate, effective	
250	and operating)? If "No" describe.		
260	Fueling areas: controls adequate (appropriate, effective, and opdescribe.		ГГЛ
270	Outdoor vehicle and equipment washing areas: controls adequated and operating)? If "No" describe.	ate (appropriate, effective	
280	Machinery: controls adequate (appropriate, effective, and operation	ating)? If "No" describe.	
290	Waste handling and disposal areas: controls adequate (approproproperating)? If "No" describe.	riate, effective, and	
300	Erodible areas/construction: controls adequate (appropriate, eff_"No" describe.	fective, and operating)? If	
310	Locations and sources of run-on to the site: controls adequate ( and operating)? If "No" describe.	(appropriate, effective,	
320	Non-stormwater/illicit connections: controls adequate (appropria operating)? If "No" describe.	ate, effective, and	
330	Salt storage piles or pile containing salt: controls adequate (approperating)? If "No" describe.	propriate, effective, and	
340	Dust generation and vehicle tracking: controls adequate (approperating)? If "No" describe.	priate, effective, and	
350	Housekeeping (Industrial materials/residues/trash in contact wit adequate (appropriate, effective, and operating)? If "No" descrit		
202	Leaks and spills: controls adequate (appropriate, effective, and describe.	operating)? If "No"	
360 Non-C	ompliance	is de la constant de	
Non-Co	Free of incidents of observed non-compliance not already ident describe.  onal Control Measures  Are permit requirements satisfied with existing control measures		
380 Addition	Free of incidents of observed non-compliance not already ident describe.		
Non-Co	Free of incidents of observed non-compliance not already ident describe.  onal Control Measures  Are permit requirements satisfied with existing control measures		
380 Addition	Free of incidents of observed non-compliance not already ident describe.  Conal Control Measures  Are permit requirements satisfied with existing control measured additional control measures needed.  Assigne	(s)? If "No" describe	Reg Hrs OT Hrs Other Hrs
Non-Co	Free of incidents of observed non-compliance not already ident describe.  Conal Control Measures  Are permit requirements satisfied with existing control measured additional control measures needed.  Assigne	(s)? If "No" describe	
Non-Co 380 Addition 400 -abor Labor Burgin,	Free of incidents of observed non-compliance not already ident describe.  Conal Control Measures  Are permit requirements satisfied with existing control measures additional control measures needed.  Assigned Measures  Ass	(s)? If "No" describe	
Non-Condition  380  Addition  400  Labor  Burgin,  Comple	Free of incidents of observed non-compliance not already ident describe.  In all Control Measures  Are permit requirements satisfied with existing control measures additional control measures needed.  Assigned 11/1/20*  Report  Report	(s)? If "No" describe	
Non-Co 380 Addition 400 -abor Labor Burgin,	Free of incidents of observed non-compliance not already ident describe.  In all Control Measures  Are permit requirements satisfied with existing control measures additional control measures needed.  Assigned 11/1/20*  Report  Report	(s)? If "No" describe	
Non-Condition  380  Addition  400  Labor  Burgin,  Comple	Free of incidents of observed non-compliance not already ident describe.  In all Control Measures  Are permit requirements satisfied with existing control measures additional control measures needed.  Assigned 11/1/20*  Report  Report	(s)? If "No" describe	
Non-Condition  380  Addition  400  Labor  Burgin,  Comple	Free of incidents of observed non-compliance not already ident describe.  In all Control Measures  Are permit requirements satisfied with existing control measures additional control measures needed.  Assigned 11/1/20*  Report  Report	(s)? If "No" describe	

Signature (lead inspector):

DEP Date and Time: W 3018

"I confirm the information as recorded is true, accurate and complete."

#### CERTIFICATION STATEMENT

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

(Signatory must meet definition in Section B.11.A, eg., FOD, Ops Mgr, DESH Group Leader, EPC Group Leader)

Print name and title: Russell Stone GL DESH - UIS

Signature: 12/14/2018

## Los Alamos National Lab - ADESH

**Maintenance Details** 

### Work Order MSGP-RI-63446

MSGP Routine Inspection Printed 12/17/2018 - 4:43 PM

•	d: 12/17/2018 4:33:25 PM e: MSGP Routine Facility	Target: Priority/Type:	12/31/2018 Normal / Inspection	MSGP Program     品 RG121.9			*
	Inspection (EPC-CP-Form- 1020.1)		Utilities and Infrastructure	TA-3-38 Metals	Fab Sh	юр	
.ast PM:	11/30/2018	4					
Project:	Routine Facility Inspections Dec. 2018 (P-MSGP-RI- 5353)	Insp 12/1	. done 8/18 2:15-8	Contact: Phone:			
leason:	2018 December Inspections		2115-8	1:35 pm			
sks			**	(e)			
# C	Description -			Meas.	No	N/A	Yes
Neather I	nformation						
20 E	Describe the weather at time of in	spection and do	cument the temperature (F	1. 470 Plc	. Б		
	= =						
	e Facility Boundary	aa af mallutamta t	h = 4 h = 1 / 2 = = = 2 / 2 / 2 / 2 / 2 / 2 / 2 / 2	. last			
	s the facility free of new discharg spection? If "Failed" describe.	es or pollutants t	nat have occurred since the	e last			
50	If "No" has a CAR been previou	sly initiated for th	nis new discharge?		Б		Е
	s the facility free of discharge of			lescribe.			
	s the facility free of evidence of,						
70 s	ystem. If "No" describe.						
	<b>lionitored Outfall [002]</b> Free of I <b>lionitored Outfall [002]</b> Flow Dis						
<u>100 d</u>	escribe.						-
	Monitored Outfall [002] Free of I Vater? If "No", describe.	Evidence of Pollu	utants in Discharges and/or	Receiving			T
	leasures (identify needed mair			ures that need replac	ment, c	га	
-	sphalt Berm [0300103040009]		•	"No"			
	escribe condition & need for Mai						-
	sphalt Berm [0300103040010]			"No"			
	escribe condition & need for Mai						
	Base Course Berm [0300103020 escribe condition & need for Mai			ly? If "No"		_	
	Prop Inlet with Petro-Plug [0300			effectively? Patro	Pen	50	00
	"No" describe condition & need			winter	. Г		F
	nviroSoxx w/ MetalLoxx [0300			ffectively? If			
170 "I	No" describe condition & need fo	r Maintenance, F	Repair, or Replacement.			jė.	
	nviroSoxx w/ MetalLoxx [0300			ffectively? If	_	_	
180 "	No" describe condition & need fo	r Maintenance, F	Repair, or Replacement.				-
Area/Activ	vity exposed to stormwater (id ).	entify needed m	nainteance or a descriptio	n of corrective action	s in rel	evant t	ask
	faterial loading/unloading and stond and operating)? If "No" describe.						
т	ransfer areas for substances in b perating)? If "No" describe.						1
	1 1/1 1 1 1 1 1	n					
	roduct/chemical storage areas ( nd operating)? If "No" describe.	aw material): co	ntrois adequate (appropriat	e, effective,			

230	Liquid tank storage/secondary containment: controls adequate and operating)? If "No" describe.	(appropri	ate, effective,		1.2	and .	1
240	Industrial processing and finished product storage areas: contri effective, and operating)? If "No" describe.	ols adequ	ate (appropriate,				
250	Equipment operation and maintenance areas: controls adequate and operating)? If "No" describe.	te (approp	oriate, effective,				[V
260	Fueling areas: controls adequate (appropriate, effective, and of describe.	perating)?	If "No"			F/	Type-
270	Outdoor vehicle and equipment washing areas: controls adequand operating)? If "No" describe.	ate (appr	opriate, effective,			E/	
280	Machinery: controls adequate (appropriate, effective, and operation)	ating)? If '	'No" describe.	-	П		
290	Waste handling and disposal areas: controls adequate (approp operating)? If "No" describe.	riate, effe	ctive, and		. 🗔	Г	[~
300	Erodible areas/construction: controls adequate (appropriate, ef "No" describe.	ffective, ar	nd operating)? If				F
310	Locations and sources of run-on to the site: controls adequate and operating)? If "No" describe.	(appropri	ate, effective,	8			F/
320	Non-stormwater/illicit connections: controls adequate (appropri operating)? If "No" describe.	iate, effec	tive, and			[J	
330	Salt storage piles or pile containing salt: controls adequate (apoperating)? If "No" describe.	propriate,	effective, and			<u></u>	п
340	Dust generation and vehicle tracking: controls adequate (approoperating)? If "No" describe.						TV.
350	Housekeeping (Industrial materials/residues/trash in contact wind adequate (appropriate, effective, and operating)? If "No" described and operating and operating and operating and operating and operating are set of the s	ibe.					<u></u>
360	Leaks and spills: controls adequate (appropriate, effective, and describe.	d operating	g)? If "No"				<b>F</b>
400	Are permit requirements satisfied with existing control measure additional control measures needed.	e(s)? If "N	o" describe				F
							_
abor –							
Labor	Assign	ned	Work Date	Reg Hrs	OT Hr	s Oth	er Hrs
Burgin,		2018 / 1					
Wheele	r, Holly 12/17/2	2018 / 1			-	-1	
abor F	Report						
Comple	eted:						
Comple	steu						
Report	:						
	· · · · · · · · · · · · · · · · · · ·						
ID: N	150P-R1-63444 Page 2 of 3						
	Jillian Burgin 211081 for the	Ny v	When how	11180	132	,	
e/Z#:	Titran Bridinialing for the	,,-,	or were	1 11.9	, 00		
ature (le	ad inspector): Thursday, CISIC (DFP)	Date and T	ime: 12/18	118	2:35	5 pr	\

"I confirm the information as recorded is true, accurate and complete."

#### **CERTIFICATION STATEMENT**

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

Print name and title:	Russell	Stone	GL	DETH-MIS	
Signature: Rese	ell Sta	Date	e: 1/	11/2019	

## Los Alamos National Lab - ADESH

and operating)? If "No" describe.

220

### Work Order MSGP-RI-63455

MSGP Routine Inspection Printed 1/15/2019 - 2:22 PM

лаıntenar	nce Details						
Requested	I: 1/15/2019 2:09:02 PM	Target:	1/31/2019	MSGP Progra	m		
rocedure	: MSGP Routine Facility	Priority/Type:	: Normal / Inspection	- RG121.9			
	Inspection (EPC-CP-Form- 1020.1)	Department:	Utilities and Infrastructure	e di TA-3-38 Meta	ls Fab SI	юр	
.ast PM:	11/30/2018		0 1/21/16				
Project:	Routine Facility Inspections Jan. 2019 (P-MSGP-RI- 5352)	Dr	11:00-11:15 جمم 11:00-11:15 جم	Contact: Phone:			
Reason: I	MSGP Routine Facility Inspection						
asks							
# D	escription			Meas	No	N/A	Yes
	n <b>formation</b> escribe the weather at time of i	nspection and do	ocument the temperature (F	°). 36° Clean	Б		Ti-
		iopositori aria de	outlient and temperature (i		nny		
	Facility Boundary		a (1		ر		
	the facility free of new dischargespection? If "Failed" describe.	ges of pollutants	tnat have occurred since th	e last			
	If "No" has a CAR been previous	ely initiated for t	his new discharge?				
	the facility free of discharge of			doseribo			
	the facility free of evidence of, ystem. If "No" describe.	or the potential t	or, pollutants entering the o	rainage			
	<b>lonitored Outfall [002]</b> Free of <b>lonitored Outfall [002]</b> Flow Di			No",			
	escribe.						
	lonitored Outfall [002] Free of later? If "No", describe.	Evidence of Poll	utants in Discharges and/o	r Receiving			
	easures (identify needed mai n of corrective actions in rele			sures that need repla	icment, d	or a	
	sphalt Berm [0300103040009]		7.1	f "No"	٨		
	escribe condition & need for Ma			now cave	red	1	
	sphalt Berm [0300103040010] escribe condition & need for Ma			f"No"		F	
	ase Course Berm [030010302 escribe condition & need for Ma			ely? If "No"	م لعم	<u></u>	
160 If	rop Inlet with Petro-Plug [030 "No" describe condition & need	for Maintenance	, Repair, or Replacement.	off for went	in <sub>F</sub>	<u></u>	
170 <u>"N</u>	nviroSoxx w/ MetalLoxx [0300 No" describe condition & need fo	or Maintenance,	Repair, or Replacement.	- Gone - was	pued	de le	<u></u>
	nviroSoxx w/ MetalLoxx [0300 No" describe condition & need fo			effectively? If			
Area/Activ	rity exposed to stormwater (id	dentify needed r	mainteance or a descripti	on of corrective action	ons in rel	evant t	ask
M	aterial loading/unloading and sind operating)? If "No" describe.	torage areas: cor	ntrols adequate (appropriate	e, effective,			<u></u>
	ransfer areas for substances in perating)? If "No" describe.	bulk: controls ad	equate (appropriate, effecti	ve, and			
Р	roduct/chemical storage areas	raw material): co	ontrols adequate (appropria	te effective			

	and operating)? If "No" describe.	9
240	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
250	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
260	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
270	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
280	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	
290	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
300	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	
310	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	
320	Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe.	
330	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	
340	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	
350	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	
360	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	
100	nal Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.	
abor		
.abor	Assigned Work Date	Reg Hrs OT Hrs Other Hrs
<b>_abor</b> Burgin, 、		Reg Hrs OT Hrs Other Hrs
Burgin, C	Jillian 1/15/2019 / 1	Reg Hrs OT Hrs Other Hr
abor R Comple Report:	eport ted:	Reg Hrs OT Hrs Other Hrs
Burgin, Cabor R Comple Report:	eport  ted:	Reg Hrs OT Hrs Other Hrs
abor R Comple Report:	eport ted:	Reg Hrs OT Hrs Other Hrs

"I confirm the information as recorded is true, accurate and complete."

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

(Signatory must meet definition in Section B.11.A, eg., FOD, Ops Mgr, DESH Group Leader, EPC Group Leader)

Print name and title: Custell Stones Col De

Signature: / weell of

Date: 2/28/2019

## Los Alamos National Lab - ALDESHQSS

Maintenance Details

220

operating)? If "No" describe.

### Work Order MSGP-RI-63467

MSGP Routine Inspection Printed 2/12/2019 - 9:04 AM

-	<b>d:</b> 2/12/2019 9:00:31 AM <b>e:</b> MSGP Routine Facility	Target: 2/28/2019 Priority/Type: Normal / Inspection	☑ MSGP Program 品 RG121.9	
	Inspection (EPC-CP-Form- 1020.2)	Department: Utilities and Infrastr		Shop
Last PM: Project:	12/18/2018 Routine Facility Inspections Feb. 2019 (P-MSGP-RI-	Inap. done 212811	Contact: Phone:	
	5354)	212811	.9	
Reason:	2019 February Inspections		5- LO:30 AM	
Tasks				
# [	Description		Meas. No	N/A Yes
Weather	Information			
20 [	Describe the weather at time of in	spection and document the temperat	ture (F°). 450910 F	
Within th	e Facility Boundary		· · · · · · · · · · · · · · · · · · ·	\ <del>.</del>
	· · · · · · · · · · · · · · · · · · ·	es of pollutants that have occurred si	nce the last	
<u>40</u> i	nspection? If "Failed" describe.			
50		sly initiated for this new discharge?		
		pollutants at the time of inspection? If		
	s the facility free of evidence of, one system. If "No" describe.	or the potential for, pollutants entering	the drainage	
Outfall in	spection (identify needed mair	ntenance and repairs, failed contro	I measures that need replacemer	ıt, or a
description	on of corrective actions in rele		·	•
		Evidence of Erosion? If "No", describe		
100 0	lescribe.	sipation Devices Operating Effective		
	Monitored Outfall [002] Free of Water? If "No", describe.	Evidence of Pollutants in Discharges	and/or Receiving	
	Monitored Outfall [002] Free of a lescribe.	any unauthorized non-stormwater dis	charges? If "No"	
Control N	leasures (identify needed mair	tenance and repairs, failed contro	I measures that need replacment	or a
description	on of corrective actions in rele	vant task comments).	•	
		Control Measure is operating effective ntenance, Repair, or Replacement.	ely? If "No"	
		Control Measure is operating effective	rely2 If "No"	
		ntenance, Repair, or Replacement.	SAMU COU. I	
		0001] Control Measure is operating e		
		ntenance, Repair, or Replacement.  109010003] Control Measure is ope	nation a effective by	
		for Maintenance, Repair, or Replacer		
		<b>103200007]</b> Control Measure is oper r Maintenance, Repair, or Replaceme		
		103200008] Control Measure is oper r Maintenance, Repair, or Replaceme		
				olovant took
comment		entify needed mainteance or a des	cripuon or corrective actions in f	elevani lask
N	•	orage areas: controls adequate (appr	opriate, effective,	
		pulk: controls adequate (appropriate,	effective, and	

230	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.				
240	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.				
250	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.				
260	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.				
270	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			-	П
280	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		Б	<b>F</b>	П
290	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.				<b>F</b>
300	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	A.1.	Б		
310	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.			Е	<u></u>
320	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		- □		
330	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г.	-	Г
340	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.				
350	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.		- F		r
360	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.		- F		Te .
380 Addition	describe.  onal Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.				<u></u>
Labor					
<b>Labor</b> Burgin,	Assigned Work Date  2/11/2019 / 1	Reg Hrs	OT Hr	s Othe	er Hrs
Comple Report	leted:	,			
) Confirm	Signature / Name  Date  Date  Display  Signature / Name  Date  Dat	3		Date	

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

I am aware that here are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations".

Print name and title:	ussell Fore	GL	DESH-UI	5	
Signature: Ressel	21 Fr		Date:	3/8/2019	

### Work Order MSGP-RI-63476

MSGP Routine Inspection Printed 3/19/2019 - 3:24 PM

Daguage	4. 2/10/2010 F.EG.00 DM	Townst. 2/21/2010	Ohusen n
-	ed: 3/18/2019 5:56:00 PM re: MSGP Routine Facility	Target: 3/31/2019 Priority/Type: / Inspection	☐ MSGP Program 品 RG121.9
- IOCEGGI	Inspection (EPC-CP-Form- 1020.2)	Department: Utilities and Infrastructure	4
Last PM:	·		
Project:	Routine Facility Inspections		Contact: Phone:
	March 2019 (P-MSGP-RI-	0	Fnone:
	5355)	3129/19 11	
Reason:	2019 March Inspections	3129/19 11	: 20 - 11: 30 Aug
asks			
#	Description		Meas. No N/A Yes
	Information		
20	Describe the weather at time of i	nspection and document the temperature (F	9). 540 PIC F F
Within th	ne Facility Boundary		
		ges of pollutants that have occurred since the	e last
	inspection? If "Failed" describe.		
50		usly initiated for this new discharge?	
		pollutants at the time of inspection? If "No" of	
	Is the facility free of evidence of, system. If "No" describe.	or the potential for, pollutants entering the dr	rainage
	-		
	ispection (identify needed mai ion of corrective actions in rele	ntenance and repairs, failed control meas	sures that need replacement, or a
		Evidence of Erosion? If "No", describe.	
		ssipation Devices Operating Effectively? If "I	
100	describe.	solpation Boriogs Operating Encouvery. It is	
	Monitored Outfall [002] Free of	Evidence of Pollutants in Discharges and/or	Receiving
	Water? If "No", describe.		
		any unauthorized non-stormwater discharge	
120 0	describe.		
		ntenance and repairs, failed control meas	ures that need replacment, or a
_	on of corrective actions in rele	· · · · · · · · · · · · · · · · · · ·	WAL II
140	Asphalt Berm [0300103040009]	Control Measure is operating effectively? If intenance, Repair, or Replacement.	"No"
		Control Measure is operating effectively? If	"No"
		intenance, Repair, or Replacement.	
		0001] Control Measure is operating effective	elv? If "No"
		intenance, Repair, or Replacement.	<u> </u>
		0109010003] Control Measure is operating e	effectively?
		for Maintenance, Repair, or Replacement.	
		0103200011] Control Measure is operating e	ffectively? If
		or Maintenance, Repair, or Replacement.	ffe atilization 16
		0103200012] Control Measure is operating e or Maintenance, Repair, or Replacement.	
		0103200013] Control Measure is operating e	ffectively? If
		or Maintenance, Repair, or Replacement.	
Area/Acti comment		lentify needed mainteance or a descriptio	on of corrective actions in relevant task
	<u> </u>	orage areas: controls adequate (appropriate	effective
N N		orbos propa, comitoia quedudite idudituditale	. CHOCKIVE.

230	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.	П		F
240	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.			
250	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.	Б	_Б_	<u></u>
260	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			<u></u>
270	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	Б	51	
280	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			i i
290	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			
300	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	П	<b>I</b>	
310	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			
320	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.			[-/
330	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.			
	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and			<u>-</u> -
340	operating)? If "No" describe.			
350	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.			
360	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.			_ <u></u>
370	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.			<u> </u>
Non-C	ompliance			
390	Free of incidents of observed non-compliance not already identified above? If "No" describe.			
Additi	onal Control Measures			
410	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.			<u> [/</u>
Labor	Report			
Comp	leted:			
Repor	<b>:</b>			
	. —			
(N	munu, DEPKISEC 3/29/19 11:30			
	Signature / Name Date Signature / Name		Date	
l confi	m the information as recorded is true, accurate and complete.			

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

Print name and title:_	Kyssell Store	<u>GL</u>	DESH-LEIG	
Signature: Re	mel for		Date:	4/9/2019

Maintenance Details

### Work Order MSGP-RI-63541

MSGP Routine Inspection Printed 4/9/2019 - 2:32 PM

•	ed: 4/9/2019 2:07:02 PM e: MSGP Routine Facility	Target: Priority/Type:	4/30/2019 Normal / Inspection	☑ MSGP Program 品 RG121.9	11			
•	Inspection (EPC-CP-Form- 1020.2)	Department:	Utilities and Infrastructure	TA-3-38 Metals	Fab SI	пор		
ast PM:	2/28/2019			Contact:				- 1
Project:	Routine Facility Inspections April 2019 (P-MSGP-RI-			Phone:				
	5361)	2	nse dans					
Paseon:	MSGP Routine Facility Inspection	on.	rsp dang 4129119					-1
\casum.	MOOF Routine Facility Inspection	JII	1:30 ~ 1:4	1D				
asks								4
# 1	Description			Meas.	No	N/A	Yes	
Weather	Information		2					
	Describe the weather at time of i	nspection and do	cument the temperature (F	). 61° Plc	=			
		noposion and do	outhers are temperature (r	<i>y</i> <b>4.</b> 110				
	e Facility Boundary	and of walls to start a		- last				1
	Is the facility free of new discharginspection? If "Failed" describe.	ges of politicarits i	riat have occurred since the	e iast			Ti-	
50	If "No" has a CAR been previou	usly initiated for the	nis new discharge?					
30 I	Is the facility free of discharge of			describe.				
	Is the facility free of evidence of,							-
70 9	system. If "No" describe.				1,0		4	1
	Monitored Outfall [002] Free of Monitored Outfall [002] Flow Di			No"	3	_4_	4	
	describe.	Colpulation Dovidor	o operating Encouvery: If I					
	Monitored Outfall [002] Free of Water? If "No", describe.	Evidence of Poll	utants in Discharges and/or	Receiving				
	Monitored Outfall [002] Free of describe.	any unauthorized	I non-stormwater discharge	es? If "No"				
	Measures (identify needed mail			ures that need replac	ment, o	га	۰، بم	
173	Asphalt Berm [0300103040009]			"No" - 200 "No" "127115			31	6
	describe condition & need for Ma						<u>F</u> ,	
	Asphalt Berm [0300103040010]	Control Measure	is operating effectively? If	"No" Remaring		u o	6 41	7
	describe condition & need for Ma				<u>-D</u>	<u> </u>		7
	Base Course Berm [030010302 describe condition & need for Ma			ayrıı NO	E			
	Orop Inlet with Petro-Plug [030			effectively?				
70 I	f "No" describe condition & need	for Maintenance	, Repair, or Replacement.				<u>-</u>	
	EnviroSoxx w/ MetalLoxx [0300 No" describe condition & need for			ffectively? If	U Di		<u> </u>	
	EnviroSoxx w/ MetalLoxx [0300 No" describe condition & need for			ffectively? If Rema	L	412	7 (19 	2
	EnviroSoxx w/ MetalLoxx [0300 No" describe condition & need fo			ffectively? If Ren	nau [	rd.	4 (2 7	-(
Area/Acti	vity exposed to stormwater (id	lentify needed n	nainteance or a descriptio	n of corrective actior	s in rel	evant ta	ask	
	. "							
	Material loading/unloading and st and operating)? If "No" describe.	orage areas: con	trols adequate (appropriate	, effective,	_	_	_/	

	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.	
240	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.	
250	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.	
260	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
270	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
280	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
290	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
300	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	
310	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
320	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	
330	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	
340	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	
350	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	
360	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	
370	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	
<b>Non-Co</b>	ompliance  Free of incidents of observed non-compliance not already identified above? If "No"	
Additic	onal Control Measures	
410	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.	
NATE:		1901 1000
	De la Company de	metal Storage
	yard to allow Sampling of the yard	
Labor.	yard to allow Sampling of the yard  Assigned Work Date Reg 1	only. 4127/19
Labor Labor Burgin,	yard to allow Sampling of the yard  Assigned Work Date Reg l  4/1/2019/1	only. 4127/19
Labor Labor Burgin,	yard to allow Sampling of the yard  Assigned Work Date Reg 1	only. 4127/19
Labor Labor Burgin,	yard to allow Sampling of the yard  Assigned Work Date Reg l  4/1/2019/1  Report	only. 4127/19
Labor Labor Burgin, Labor i	yard to allow Sampling of the yard  Assigned Work Date Reg l  4/1/2019 / 1  Report  leted:	only. 4127/19
Labor Labor Burgin, Labor I	yard to allow Sampling of the yard  Assigned Work Date Reg l  4/1/2019 / 1  Report  leted:	only. 4127/19
Labor Labor Burgin, Labor I	yard to allow Sampling of the yard  Assigned Work Date Reg l  4/1/2019 / 1  Report  leted:	only. 4127/19
Labor Labor Burgin, Labor I	yard to allow Sampling of the yard  Assigned Work Date Reg l  4/1/2019 / 1  Report  leted:	only. 4127/19

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

Print name and title:_	Russell Stone	GC	DESH-UIS	
Signature:	Poul For		Date:	-16/2019

operating)? If "No" describe.

and operating)? If "No" describe.

Product/chemical storage areas (raw material): controls adequate (appropriate, effective,

### Work Order MSGP-RI-63656

MSGP Routine Inspection

	ones Detaile				Printed !	5/20/201	9 - 4:38	PM
	ance Details							
•	ed: 5/20/2019 4:38:00 PM re: MSGP Routine Facility Inspection (EPC-CP-Form- 1020.2)	Priority/Type: No	31/2019 ormal / Inspection tilities and Infrastructure	型 MSGP Program 品 RG121.9 ຝ TA-3-38 Metals		пор		
_ast PM:	3/29/2019							
Project:	Routine Facility Inspections May 2019 (P-MSGP-RI- 5371)	gand	done	Contact: Phone:				
	•	512	2119					
Reason:	2019 May Inspections	(0:0	.5 - 10:30 H	M			81	
asks	;	•						=
#	Description			Meas.	No	N/A	Yes	
Weather	Information			0 - 1 -				
20	Describe the weather at time of ir	spection and docum	nent the temperature (F°)	50° PIC			E	
Within th	ne Facility Boundary							
	Is the facility free of new discharginspection? If "Failed" describe.	es of pollutants that	have occurred since the	last			<b>~</b>	_
50	If "No" has a CAR been previou	sly initiated for this	new discharge?			~		
30	Is the facility free of discharge of	pollutants at the time	e of inspection? If "No" de	escribe.			<u> </u>	
	Is the facility free of evidence of,	or the potential for, p	collutants entering the dra	ainage		_	_	
70	system. If "No" describe.							
	nspection (identify needed main			res that need replac	ement,	or a		
	ion of corrective actions in rele		'					
	Monitored Outfall [076] Free of Monitored Outfall [076] Flow Dis			lo"				
	describe.	ssipation bevices Of	perating Ellectively? It is			Г		
	Monitored Outfall [076] Free of Water? If "No", describe.	Evidence of Pollutar	nts in Discharges and/or I	Receiving				
	Monitored Outfall [076] Free of	any unauthorized no	n-stormwater discharges	s? If "No"		_		
160	describe.							
	Measures (identify needed mair ion of corrective actions in rele			ires that need replac	ment, c	or a		
180	Asphalt Berm [0300103040014] describe condition & need for Ma	ntenance, Repair, o	r Replacement.					
190	Base Course Berm [0300103020 describe condition & need for Mai	ntenance, Repair, o	r Replacement. Needs	repair &	Sce t			CA
	Drop Inlet with Petro-Plug [0300 If "No" describe condition & need			ffectively?		Е		ĺ
	F	40000004FT Onutural	Management of the second of th	fectively? If	in	prox	er	oc
210	"No" describe condition & need fo	r Maintenance, Rep	air, or Replacement. ve	eas to loe V				C.
	EnviroSoxx w/ MetalLoxx [0300 "No" describe condition & need fo	103200016] Control	i Measure is operating en	rectively? It		_F	<u> </u>	
Area/Act	ivity exposed to stormwater (id	entify needed mair	nteance or a description	of corrective action	s in rel	evant ta	ask	
- 1	Material loading/unloading and st and operating)? If "No" describe.	orage areas: control	s adequate (appropriate,	effective,		П	<b></b>	
	Transfer areas for substances in t	oulk: controls adequ	ate (appropriate, effective	e. and				

	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.		L.	
280	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	- 12		
290	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			
300	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	ГТ		
310	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	П		
320	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.			
30	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			
340	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	Б		
350	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.			
360	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.			
370	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.		П	
380	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.   Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" ME	15 c	lean	-UP SU
390	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" WE describe.	Store	×50	
hor I	Report			
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ompi	leted:			
Report	t:			
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S	Signature / Name Date Signature / Name	-	Dete	
confir	m the information as recorded is true, accurate and complete.		Date	
	CERTIFICATION STATEMENT			
etific n	under penalty of law that this document and all attachments were prepared under my direction or s	unarii	ion in	
	e with a system designed to assure that qualified personnel properly gathered and evaluated the in			mitted.
	, r)			
rdance	ny inquiry of the person or persons who manage the system, or those persons directly responsible	ior gai	hering	
rdance ed on n mation e are si	n, the information submitted is, to the best of my knowledge and belief, true, accurate, and complignificant penalties for submitting false information, including the possibility of fine and imprison	ete. Ī a	n awar	
ordance ed on re rmation e are si ations"	n, the information submitted is, to the best of my knowledge and belief, true, accurate, and complignificant penalties for submitting false information, including the possibility of fine and imprison	ete. Ī a	n awar	
ordance ed on re rmation e are si ations"	on, the information submitted is, to the best of my knowledge and belief, true, accurate, and complignificant penalties for submitting false information, including the possibility of fine and imprison.	ete. Ī a	n awar	

### Work Order MSGP-RI-63716

MSGP Routine Inspection Printed 6/10/2019 - 12:48 PM

### **Maintenance Details**

Requested: 6/10/2019 12:38:52 PM

Procedure: MSGP Routine Facility

Inspection (EPC-CP-Form-

1020.2)

Last PM: 4/29/2019

Project:

Routine Facility Inspections June 2019 (P-MSGP-RI-

Reason: 2019 June Inspections

Target: 6/28/2019

Priority/Type: Normal / Inspection

**Department:** Utilities and Infrastructure

MSGP Program

샮 RG121.9

TA-3-38 Metals Fab Shop

Contact: Phone:

Insp. done 16/27/19 11:10-11:20

Tasks					
#	Description	Meas.	No	N/A	Yes
Weat	her Information			47	
20	Describe the weather at time of inspection and document the temperature (F°). 74°	Plc	:		
Withi	n the Facility Boundary				
40	Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe.			П	
50	If "No" has a CAR been previously initiated for this new discharge?			TV	
60	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.				7
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.				
desci	II Inspection (identify needed maintenance and repairs, failed control measures that nee ription of corrective actions in relevant task comment)	ed replace	ment,	or a	
90	Monitored Outfall [002] Free of Evidence of Erosion? If "No", describe.				/
100	Monitored Outfall [002] Flow Dissipation Devices Operating Effectively? If "No", describe.				- C
110	Monitored Outfall [002] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.			r/	г \
120	Monitored Outfall [002] Free of any unauthorized non-stormwater discharges? If "No" describe.				Б
130	Monitored Outfall [076] Free of Evidence of Erosion? If "No", describe.				1
140	Monitored Outfall [076] Flow Dissipation Devices Operating Effectively? If "No", describe.			Б.	
150	Monitored Outfall [076] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.			·	
160	Monitored Outfall [076] Free of any unauthorized non-stormwater discharges? If "No" describe.				
Contr descr	ol Measures (identify needed maintenance and repairs, failed control measures that nee iption of corrective actions in relevant task comments).	d replacm	ent, o	ra	
180	Asphalt Berm [0300103040014] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Dis.	П	12
190	Base Course Berm [0300103020001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	П	<u> </u>
200	Drop Inlet with Petro-Plug [0300109010003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		П	П	
210	EnviroSoxx w/ MetalLoxx [0300103200015] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<u> </u>		
220	EnviroSoxx w/ MetalLoxx [0300103200016] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<u>т</u> .		

Area/Activity exposed to stormwater (identify needed mainteance or a description of corrective actions in relevant task

comm	ent).	
240	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
250	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.	
260	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.	
270	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.	
280	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
290	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
300	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	ПБГ
310	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
320	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	
330	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
340	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	
350	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	
360	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	
370	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	
380	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	
390	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	
N 0 -		
410	ompliance Free of incidents of observed non-compliance not already identified above? If "No" describe.	
Additio 430	onal Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.	
abor		
Labor	Work Date Reg	Hrs OT Hrs Other Hrs
	e)	
abor R	Report	
Comple	eted:	
Report:		V 6
		10
Bu	igin Jillian Burgin 6/27/19	
confirm	Signature / Name Date Signature / Name nthe information as recorded is true, accurate and complete.	Date

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

Print name and title:	Russell Jone	GL DESH-UES	
Signature: Ruse	Il Jan	Date:	7/16/2019

### Work Order MSGP-RI-63827

MSGP Routine Inspection Printed 7/24/2019 - 10:01 AM

anuacto	ed: 7/17/2019 1:12:47 PM	Target:	7/31/2019	- MOOT	D			
-	re: MSGP Routine Facility	_	Normal / Inspection		Program			
ocedui	Inspection (EPC-CP-Form-	2 2	· ·	♣ RG12		<b>.</b> 06		
	1020.2)	Department.	Utilities and Infrastructure	IA-3-3	8 Metals Fa	o Snop	•	
ast PM:	6/27/2019							
roject:	Routine Facility Inspections July		2 -1 2-1	Contact:				
	2019 (P-MSGP-RI-5386)	In	sp. done	Phone:				
eason:	2019 July Inspections	-	7/31/19					
			sp. done 7131119 1:45 - 2:00					
sks								
#	Description				Meas.	No	N/A	Yes
Veather	Information							
	Describe the weather at time of inspe	ection and docum	ment the temperature (F°)	820	PIC		-0	<u> </u>
		a. a. a. a.		0-		114		
	ne Facility Boundary	.e	(1) (1) (1) (1) (1) (1) (1) (1) (1) (1)					
·0 '	Is the facility free of new discharges "Failed" describe.	or pollutants that	nave occurred since the la	ast inspection? If				
50	If "No" has a CAR been previously	initiated for this	new discharge?		,		+	=
	Is the facility free of discharge of poll			cribe		+		
	Is the facility free of evidence of, or the					-15-	100	15
				nade evetem It				
0	"No" describe.  Inspection (identify needed mainter reactions in relevant task commer	nance and repai			lacement, o	r a des	criptio	n of
Outfall In	"No" describe. rspection (identify needed mainter	nance and repai	irs, failed control measur		lacement, o	rades	criptio	on of
Outfall Incorrectiv	"No" describe. nspection (identify needed mainter re actions in relevant task commer	nance and repaint)	irs, failed control measur	es that need rep	lacement, o	rades	criptio	n of
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30   140   150   1	"No" describe.  Inspection (identify needed mainter of actions in relevant task commer of actions in relevant task commer of the comment of t	lence of Erosion ation Devices Operation Devices Devices Devices Operation Devices Operation Devices Operation Devices Devic	irs, failed control measure? If "No", describe. perating Effectively? If "No" hts in Discharges and/or Reson-stormwater discharges? rs, failed control measure operating effectively? If "Noment. ure is operating effectively? ement. of Measure is operating effert Replacement. I Measure is operating effert Replacement. I Measure is operating effert Replacement. I Measure is operating effert Replacement. Interance or a description of a dequate (appropriate, etc.)	es that need rep  ", describe. eceiving Water? If If "No" describe. es that need rep o" describe If "No" describe ectively? If "No" ctively? If "No" ctively? If "No"	lacment, or	a desc	ription	IND DID TO DE DE DE DE MENT.
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Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and

Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and

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270

operating)? If "No" describe.

operating)? If "No" describe.

280	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		F
290	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
300	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
310	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	ПГ	1 🗖
320	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe,		
	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If		
330	"No" describe.		
340	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u></u>
350	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		
360	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	ГГ	
370	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If		<u></u>
380	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.		
390	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u></u>
Non-C	ompliance		
410	Free of incidents of observed non-compliance not already identified above? If "No" describe.	- B D	[]
	Report		
l confi	Signature / Name  Signature / Name  The information as recorded is true, accurate and complete.	Date	
	CERTIFICATION STATEMENT		
tem de son or best of se infor gnatory i	under penalty of law that this document and all attachments were prepared under my direction or supersigned to assure that qualified personnel properly gathered and evaluated the information submitted. It persons who manage the system, or those persons directly responsible for gathering information, the if my knowledge and belief, true, accurate, and complete. I am aware that there are significant penaltic rmation, including the possibility of fine and imprisonment for knowing violations".  **must meet definition in Section B.11.A, eg. FOD, Ops Mgr, DESH Group Leader, EPC Group Leader)**  **each Complete Com	Based on my inqu nformation subm	iry of th
gnature	Result 8to Date: 8/19/2019		

and operating)? If "No" describe.

220

**Maintenance Details** 

### Work Order MSGP-RI-63907

MSGP Routine Inspection Printed 8/13/2019 - 2:09 PM

Requeste	ed: 8/13/2019 2:04:20 PM	Target:	8/31/2019	SGP F	rogram			
Procedure: MSGP Routine Facility		Priority/Type:	Normal / Inspection	品 RG121.9	9			
	Inspection (EPC-CP-Form-	Department:	Utilities and Infrastructure	<b>♣</b> TA-3-38	Metals Fa	b Sh	ор	
	1020.2)							
Last PM:				Contact:		0		
Project:	Routine Facility Inspections	ρ	· O Tours					
	August 2019 (P-MSGP-RI- 5393)	In	ap Down.					
	3393)		8/28/19					
Reason:	2019 August Inspections		0/2011					
			2:00-2:1	5 pm				
asks —								
#	Description			1	Meas. I	No.	N/A	Yes
18141	In Source Address							
	Information			CADDS		_	_	_
20	Describe the weather at time of i	nspection and do	cument the temperature (F	). 82°S	unny			
Within th	ne Facility Boundary							
	Is the facility free of new dischar	ges of pollutants	that have occurred since the	last				
	inspection? If "Failed" describe.							9
50	If "No" has a CAR been previous	usly initiated for th	nis new discharge?					
60 i	Is the facility free of discharge of	pollutants at the	time of inspection? If "No" d	escribe.				-
	ls the facility free of evidence of,		<del></del>					
	system. If "No" describe.			3				2
Outfall In				414		4		
	nspection (identify needed mai ion of corrective actions in rele			ures that need	replacem	ent, c	or a	
	Monitored Outfall [076] Free of		•			_		
	Monitored Outfall [076] Flow Di			lo"				4
	describe.	ssipation Devices	s Operating Lifectively! If I	<b>40</b> ,				
	Monitored Outfall [076] Free of	Evidence of Polli	utants in Discharges and/or	Receiving				
	Water? If "No", describe.	211401100 07 7 0111	atamo in Dioonargoo anaror	rtecerring				4
	Monitored Outfall [076] Free of	any unauthorized	d non-stormwater discharge	s? If "No"		,		
	describe.		<b>g</b> -					T.
	Measures (identify needed mai ion of corrective actions in rele			ures that need	replacme	nt, oi	ra	
	Asphalt Berm [0300103040014		•	"No"				
	describe condition & need for Ma			NU				[
	Base Course Berm [030010302			lv? If "No"				
	describe condition & need for Ma			.,	ſ			E.
	Drop Inlet with Petro-Plug [030			ffectively?				
	If "No" describe condition & need				1			4
	EnviroSoxx w/ MetalLoxx [030	0103200015] Cor	ntrol Measure is operating e	fectively? If				
170 "	"No" describe condition & need for	or Maintenance, f	Repair, or Replacement.					L.
		14022000461 C	1 1 6 6 12 12 12	fectively? If				
E	EnviroSoxx w/ MetalLoxx [030	OTUSZUUUTOJ COL	ntrol Measure is operating e					
	EnviroSoxx w/ MetalLoxx [0306 "No" describe condition & need fo							
180 "	"No" describe condition & need for	or Maintenance, F	Repair, or Replacement.			T.	T	
180 <u>"</u> Area/Acti	"No" describe condition & need for ivity exposed to stormwater (id	or Maintenance, F	Repair, or Replacement.		actions in	rele	vant t	
180 " Area/Acti comment	"No" describe condition & need for ivity exposed to stormwater (in t).	or Maintenance, F	Repair, or Replacement.	n of corrective	actions in	rele	vant t	
180 " Area/Acti comment	"No" describe condition & need for ivity exposed to stormwater (int).  Material loading/unloading and s	or Maintenance, F	Repair, or Replacement.	n of corrective	actions ir	rele	vant t	ask
Area/Acti comment	"No" describe condition & need for ivity exposed to stormwater (in t).  Material loading/unloading and sand operating)? If "No" describe.	or Maintenance, for Maintenance, f	Repair, or Replacement.  nainteance or a descriptio  ntrols adequate (appropriate	n of corrective	actions ir	rele	evant t	ask
Area/Acticomment	"No" describe condition & need for ivity exposed to stormwater (int).  Material loading/unloading and s	or Maintenance, for Maintenance, f	Repair, or Replacement.  nainteance or a descriptio  ntrols adequate (appropriate	n of corrective	actions in	rele	vant t	ask

230	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.				
240	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.				
:50	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.				
60	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			[]	
70	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.				
80	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.		T-i		J
90	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.				
00	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.			J	<u>_</u>
10	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.				
20	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.			P	
30	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.				<u></u>
340	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.				
350	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.				<u></u>
370 Additio	describe.  conal Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe			3	
390	additional control measures needed.		3	B	ال ا
abor					
L <b>abor</b> Burgin,	Assigned Work Date , Jillian 8/13/2019 / 1	Reg Hrs	OT Hr	s Otl	her Hrs
	Report leted:tt:				
J&	TUSIL / T.B. Vin Stable				
confir	Signature / Name Date Signature / Name rm the information as recorded is true, accurate and complete.		-	Date	Э

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

		δu .etc.
	there a	are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing ions".
1	(Signal	tory must meet definition in Section B.11.A, eg. FOD, Ops Mgr, DESH Group Leader, EPC Group Leader)

(Signatory must meet definition i	n Section B.11.A, eg. FOD, Ops Mgr, DESH G	Group Leader, EPC Group Leader)
Print name and title:	Russell Stone	
Signature: Luz	Dl. Stor	Date: 9/5/2019

230

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250

260

operating)? If "No" describe.

operating)? If "No" describe.

effective, and operating)? If "No" describe.

Industrial processing and finished product storage areas: controls adequate (appropriate,

Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.

Equipment operation and maintenance areas: controls adequate (appropriate, effective, and

#### Work Order MSGP-RI-63943

MSGP Routine Inspection Printed 9/13/2019 - 3:29 PM

Maintenance Details Requested: 9/13/2019 3:21:10 PM Target: 9/30/2019 MSGP Program Procedure: MSGP Routine Facility Priority/Type: Normal / Inspection 品 RG121.9 Inspection (EPC-CP-Form-**Department:** Utilities and Infrastructure 📤 TA-3-38 Metals Fab Shop 1020.2) Last PM: 7/31/2019 Contact: Project: Routine Facility Inspections 9130119 Phone: September 2019 (P-MSGP-RI-5401) 12:15-12:30 Reason: 2019 September Inspections Tasks Description Meas. No N/A Yes Weather Information Describe the weather at time of inspection and document the temperature (F°). Within the Facility Boundary Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe. 40 50 If "No" has a CAR been previously initiated for this new discharge? 60 Is the facility free of discharge of pollutants at the time of inspection? If "No" describe, Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If 70 Outfall Inspection (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comment) Monitored Outfall [076] Free of Evidence of Erosion? If "No", describe Monitored Outfall [076] Flow Dissipation Devices Operating Effectively? If "No", describe. 100 Monitored Outfall [076] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If 110 "No", describe. 120 Monitored Outfall [076] Free of any unauthorized non-stormwater discharges? If "No" describe. Control Measures (identify needed maintenance and repairs, failed control measures that need replacment, or a description of corrective actions in relevant task comments). Asphalt Berm [0300103040014] Control Measure is operating effectively? If "No" describe 140 condition & need for Maintenance, Repair, or Replacement. Base Course Berm [0300103020001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement. 150 Drop Inlet with Petro-Plug [0300109010003] Control Measure is operating effectively? If "No" 160 describe condition & need for Maintenance, Repair, or Replacement, EnviroSoxx w/ MetalLoxx [0300103200015] Control Measure is operating effectively? If "No" 170 describe condition & need for Maintenance, Repair, or Replacement. Replaced EnviroSoxx w/ MetalLoxx [0300103200016] Control Measure is operating effectively? If "No describe condition & need for Maintenance, Repair, or Replacement. Area/Activity exposed to stormwater (identify needed mainteance or a description of corrective actions in relevant task comment). Material loading/unloading and storage areas; controls adequate (appropriate, effective, and 200 operating)? If "No" describe. Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If 210 "No" describe Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and 220 operating)? If "No" describe Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and

270	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
280	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	
290	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
300	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	
310	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	
320	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	пеп
330	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If"No" describe.	ппг
340	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	
350	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	
370	Free of incidents of observed non-compliance not already identified above? If "No" describe.  Onal Control Measures  Are permit requirements setisfied with existing central measure(e)? If "No" describe additional	
390	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.	
Compl Repor		
confi	Signature / Name  Date  Signature / Name  Signature / Name  Signature / Name	Date
	CERTIFICATION STATEMENT	
tem de son or best of se infor	under penalty of law that this document and all attachments were prepared under my direction or sursigned to assure that qualified personnel properly gathered and evaluated the information submitted persons who manage the system, or those persons directly responsible for gathering information, the fragment my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalty mation, including the possibility of fine and imprisonment for knowing violations.  **Index of the complete of the co	Based on my inquiry of the information submitted is,
it nam	Date: 10/8/2019	

### Work Order MSGP-RI-64029

Mainten	nance Details		P	MSG rinted 10	P Routii 0/14/201	ne Inspectio 19 - 4:43 PN
		Target: 10/31/2019 Priority/Type: Normal / Inspection Department: Utilities and Infrastructure	MSGP Program  □ RG121.9 □ TA-3-38 Metals Fat  Contact: Phone:	o Shop		
Reason:	2019 October Inspections	Drop. Done 10/29/19 11:45-12:00				
asks	18	31.4.4	-			
#	Description		Meas.	No	N/A	Yes
<b>Weathe</b> i 20	r Information	matters and decrees at the terroristics (FR)	T,0 6	_	_	
20	Describe the weather at time of inst	ection and document the temperature (F°).	510 Sunny			
Vithin t	he Facility Boundary					
10	Is the facility free of new discharges "Failed" describe.	of pollutants that have occurred since the last in	spection? If			
50	If "No" has a CAR been previously	/ initiated for this new discharge?				
0	NOT BE SEED AT TRACE - TO SEE	lutants at the time of inspection? If "No" describe				T
		the potential for, pollutants entering the drainage				
70	describe.		-,		E.	1
correctiv 90 100	ve actions in relevant task comme Monitored Outfall [076] Free of Ev Monitored Outfall [076] Flow Dissi	idence of Erosion? If "No", describe. pation Devices Operating Effectively? If "No", de	scribe.			
110	Monitored Outfall [076] Free of Evi "No", describe.	dence of Pollutants in Discharges and/or Receiv	ing Water? If			T
20	Monitored Outfall [076] Free of any	/ unauthorized non-stormwater discharges? If "N	lo" describe.			
orrectiv	ve actions in relevant task comme Asphalt Berm [0300103040014] Co	ontrol Measure is operating effectively? If "No" de		descri	otion o	f
	condition & need for Maintenance, F					TV-
50	condition & need for Maintenance, R					Tu-
60	describe condition & need for Mainte				īzi.	1
70	describe condition & need for Mainte				п	[]
80	EnviroSoxx w/ MetalLoxx [030010 describe condition & need for Mainte	3200018] Control Measure is operating effective enance, Repair, or Replacement.	y? If "No"	П	П	
		tify needed mainteance or a description of co ge areas: controls adequate (appropriate, effecti opered metal: A Narol, C		nt task	comm	ent).
	Transfer areas for substances in bull "No" describe.	c controls adequate (appropriate, effective, and	operating)? If			طر بر
		material): controls adequate (appropriate, effec	tive, and	_ <u></u> .		
		inment: controls adequate (appropriate, effective	, and	——————————————————————————————————————		

Industrial processing and finished product storage areas: controls adequate (appropriate, effective,

Equipment operation and maintenance areas: controls adequate (appropriate, effective, and

Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.

240

250 260 and operating)? If "No" describe.

operating)? If "No" describe.

270	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.				
280	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.			-E	
290	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			Б.	
300	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.			——————————————————————————————————————	ستا
310	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		<del></del>	m.	
320	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)?			<u> </u>	<u> </u>
330	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.		 	12.	
340	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.			——————————————————————————————————————	
350	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.				
370 Additio	Free of incidents of observed non-compliance not already identified above? If "No" describe.  nal Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.				
abor –	Assigned Work Date	Reg Hrs	OT Hrs	Othe	r Hrs
Burgin, .	<del>-</del>		•	•	
Report:	Signature / Name  Date  Signature / Name  Signature / Name  Signature / Name		D	ate	
	CERTIFICATION STATEMENT				
em desig on or pe pest of n	der penalty of law that this document and all attachments were prepared under my direction or signed to assure that qualified personnel properly gathered and evaluated the information submitteers on submitteers on the system, or those persons directly responsible for gathering information, the system of the system, accurate, and complete. I am aware that there are significant penaltion, including the possibility of fine and imprisonment for knowing violations.	ed. Based o	on my inquition subr	uiry o	f the
	st meet definition in Section B.11.A, eg. FOD, Ops Mgr, DESH Group Leader, EPC Group Leader)				
name a	and title: Russell Stone Gr. DOSH-UTS				
nature:	Mussell Stone Gr. DOSH-1155  Mussell Stone Gr. DOSH-1155  Date: 4/8/2019				

and operating)? If "No" describe.

220

### Work Order MSGP-RI-64113

MSGP Routine Inspection Printed 11/21/2019 - 2:53 PM

nanne	nance Details						
_	sted: 11/21/2019 2:47:59 PM ure: MSGP Routine Facility Inspection (EPC-CP-Form- 1020.2)	Target: Priority/Type: Department:	11/30/2019 Normal / Inspection Utilities and Infrastructure	🤐 MSGP Progra 品 RG121.9 📤 TA-3-38 Meta		hop	
Last Pl	<b>1</b> : 9/30/2019						
Project	Routine Facility Inspections November 2019 (P-MSGP- RI-5418)	٥	nsp done	Contact: Phone:			
Reason	: 2019 November Inspections		111/20119				
			12:30 -12:4	7			
asks							
#	Description			Meas	. No	N/A	Yes
Weath	er Information				x-		
20	Describe the weather at time of	inspection and do	cument the temperature (F°	). 45° Clou	dy r		
Within	the Facility Boundary				)		
	Is the facility free of new dischar	rges of pollutants t	hat have occurred since the	ast			
40	inspection? If "Failed" describe.						
50	If "No" has a CAR been previo						
60	Is the facility free of discharge o						<u></u>
70	Is the facility free of evidence of system. If "No" describe.	, or the potential fo	or, pollutants entering the dra	ainage	_	_	<b>~</b>
gescrip 90	otion of corrective actions in rel  Monitored Outfall [076] Free o  Monitored Outfall [076] Flow D	f Evidence of Eros	ion? If "No", describe.	lo",			<u></u>
100	describe.						
110	Monitored Outfall [076] Free o Water? If "No", describe.				Б		Ţ,
120	Monitored Outfall [076] Free or describe.	f any unauthorized	non-stormwater discharges	s? If "No"			
	Measures (identify needed ma			ures that need repla	icment, d	or a	-
aescrip	ition of corrective actions in rel Asphalt Berm [0300103040014		•	'No"			
140	describe condition & need for Ma			INU	П		[~
	Base Course Berm [030010302	20001] Control Me	asure is operating effectivel	y? If "No"			
150	describe condition & need for Ma						
160	Drop Inlet with Petro-Plug [030	d for Maintenance,	Repair, or Replacement.				<u></u>
170	"No" describe condition & need to	for Maintenance, R	Repair, or Replacement.				<u> </u>
180	EnviroSoxx w/ MetalLoxx [030 "No" describe condition & need f			fectively? If			<u></u>
Area/Ac	ctivity exposed to stormwater (i	dentify needed m		of corrective action	ns in rel	evant t	ask
200	Material loading/unloading and s and operating)? If "No" describe.		rols adequate (appropriate,		( )	7 te.	nce lin
210	Transfer areas for substances in operating)? If "No" describe.						
	Product/chemical storage areas	(row motorial): cor	strala adaguata (annanciata	offeeting.			

230	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe,			l	
240	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			Ti.	
250	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.				Ti/
260	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			[·/	
270	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			[V	
280	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.				
290	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		- D		[·
300	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.		- B		<u> </u>
310	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.				
320	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.		г.		
330	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.		- F		√
340	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.		П		
350	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	/		——- G	F_
390	Free of incidents of observed non-compliance not already identified above? If "No" describe.  conal Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.				
Labor-					
Labor Burgin,	Jillian Assigned Work Date  11/30/2019 / 1	Reg Hrs	OT Hrs	Othe	r Hrs
Comple					
DP I confirm	Signature / Name Date Signature / Name m the information as recorded is true, accurate and complete.			Date	

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

there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations".

Print name and title	: Kussell	Stone	DESH-UTS	GL,		
	1 22 -		24		37 M	
Signature:	Rundl 5	-		_Date:	12/4/2019	

#### Work Order MSGP-RI-64124

MSGP Routine Inspection Printed 12/10/2019 - 10:01 AM Maintenance Details Requested: 12/10/2019 9:56:37 AM Target: 12/31/2019 过 MSGP Program Procedure: MSGP Routine Facility Priority/Type: Normal / Inspection 놂 RG121.9 Inspection (EPC-CP-Form-**Department:** Utilities and Infrastructure ♣ TA-3-38 Metals Fab Shop 1020.2) Last PM: 11/20/2019 Contact: Routine Facility Inspections Project: Phone: December 2019 (P-MSGP-RI-5424) Reason: 2019 December Inspections **Tasks** Description Weather Information 20 F Clear Describe the weather at time of inspection and document the temperature (F°) Within the Facility Boundary Is the facility free of new discharges of pollutants that have occurred since the last inspection? If 40 "Failed" describe. If "No" has a CAR been previously initiated for this new discharge? 60 Is the facility free of discharge of pollutants at the time of inspection? If "No" describe, Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If 70 "No" describe. Outfall Inspection (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comment) Monitored Outfall [076] Free of Evidence of Erosion? If "No", describe. 100 Monitored Outfall [076] Flow Dissipation Devices Operating Effectively? If "No", describe. Monitored Outfall [076] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If 110 "No", describe. 120 Monitored Outfall [076] Free of any unauthorized non-stormwater discharges? If "No" describe. Control Measures (identify needed maintenance and repairs, failed control measures that need replacment, or a description of corrective actions in relevant task comments). Asphalt Berm [0300103040014] Control Measure is operating effectively? If "No" describe 140 condition & need for Maintenance, Repair, or Replacement. Base Course Berm [0300103020001] Control Measure is operating effectively? If "No" describe 150 condition & need for Maintenance, Repair, or Replacement. Drop Inlet with Petro-Plug [0300109010003] Control Measure is operating effectively? If "No" 160 describe condition & need for Maintenance, Repair, or Replacement, EnviroSoxx w/ MetalLoxx [0300103200017] Control Measure is operating effectively? If "No describe condition & need for Maintenance, Repair, or Replacement. We not fusewhite 170 remove EnviroSoxx w/ MetalLoxx [0300103200018] Control Measure is operating effectively? If "No describe condition & need for Maintenance, Repair, or Replacement. 180 Area/Activity exposed to stormwater (identify needed mainteance or a description of corrective actions in relevant task comment) Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe. Some exotic metal rack material nee 200 Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If 210 "No" describe. Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and

220 operating)? If "No" describe. Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and 230 operating)? If "No" describe Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe. 240 Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe. 250 260 Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe,

280	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.		П		T.
290	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	-			
300	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.				
310	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		المناسم		  -  -
320	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	-	ـقلـن		
330	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? I "No" describe.	f			
340	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate		. ــــــــــــــــــــــــــــــــــــ	<u> </u>	
350					
Non-Co	mpliance Free of incidents of observed non-compliance not already identified above? If "No" describe.		П	П	Б
Additio	nal Control Measures				
390	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.			П.,	Г
Labor			-		
Labor	Assigned Work Date	Reg Hrs	OT Hrs	Oth	er ŀ
Shendo	Marwin 12/10/2019 / 1				
Labor R Comple	ted:	11	.(	1	
Comple Report: CAR 1 (AR 2 CAR 3 0038	Exotic metal in storage area needs to be covered of salvaged.  Metal Rack material setting on two wood perlots need to be Piece of storm gutter from the binding had fallen on the and needs to be salvaged along with the unused metal  Signature / Name  Date  Signature / Name	covered worth	e staro or size ? leging	less clvag fy	s-ed
Comple Report: CAR 1 (AR 2 CAR 3 0038	Exotic metal in storage area needs to be covered of salvaged.  Instal Rack material sitting on two wood perlots need to be piece of storm guffer from the binding had fallen on the and needs to be salvaged along with the unused metal lift 19  Signature / Name  Date  Signature / Name  The information as recorded is true, accurate and complete.		leging	by.	s. ed
Comple Report: CAR 1 CAR 2 D0 38 I confirm	Signature / Name  Signature / Name  CERTIFICATION STATEMENT	e north	leying	Date	s. ed
Report: CAR 1 CAR 2 OV 38 I confirm "I certify un system desig person or pe the best of n false inform	Signature / Name  CERTIFICATION STATEMENT  CHAPT  COMPANY OF THE CONTROL OF	or supervisinitted. Baseon, the infor	on in ac	Date cordar inquir submit	y o
Report: CAR 1 CAR 2 OV 38 I confirm "I certify un system desig person or pe the best of n false inform	Signature / Name  CERTIFICATION STATEMENT  der penalty of law that this document and all attachments were prepared under my direction gened to assure that qualified personnel properly gathered and evaluated the information subnersons who manage the system, or those persons directly responsible for gathering information by knowledge and belief, true, accurate, and complete. I am aware that there are significant properly knowledge and belief, true, accurate, and complete. I am aware that there are significant properly knowledge and belief, true, accurate, and complete. I am aware that there are significant properly knowledge and belief, true, accurate, and complete. I am aware that there are significant properly knowledge and belief, true, accurate, and complete.	or supervisinitted. Baseon, the infor	on in ac	Date cordar inquir submit	y o
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ATTACHMENT 8: QUARTERLY VISUAL ASSESSMENTS



Environmental Protection & Compliance Division Compliance Programs Group

To: Jillian Burgin, DESH-UIS, B274

Thru: Terrill Lemke, EPC-CP, K490

From: Holly Wheeler, EPC-CP, K490

Phone: 505-667-1312 Symbol: EPC-DO: 19-199

Date:

JUL 0 3 2019

Subject: National Pollutant Discharge Elimination System (NPDES) Permit Tracking No. NMR050013, Multi-Sector General Permit (MSGP) Quarterly Visual Assessment (QVA) Form for April and May of 2019 for the TA-3-38 Carpenter Shop

Please find attached a completed MSGP QVA form documenting a visual assessment performed during the first quarter of monitoring at the TA-3-38 Carpenter Shop. Per Parts 3.2.2 and 5.5 of the 2015 MSGP, the signed certification statement and associated QVA form shall be incorporated into your MSGP Stormwater Pollution Prevention Plan (SWPPP).

Part 3.2.1 of the 2015 MSGP requires the visual assessment of stormwater discharge samples collected from each outfall once each quarter for the entire permit term. Part 3.2.3 allows facilities that are located in an area with a semi-arid climate and/or in an area where freezing conditions exist for an extended period to distribute the quarterly visual assessments during seasons when precipitation runoff occurs. Accordingly, Triad National Security, LLC (Triad) has designated the following MSGP monitoring quarters.

Quarter 1: April – May Quarter 2: June – July

Quarter 3: August – September Quarter 4: October - November

The attached QVA form documents the following information required by Part 3.2.2 of the 2015 MSGP and was completed by Environmental Compliance Programs (EPC-CP) personnel.

- Sample location;
- Sample collection date and time, and visual assessment date and time for each sample;
- Personnel collecting the sample and performing the visual assessment, and their signatures;
- Nature of the discharge (i.e., runoff or snowmelt);
- Results of observations of the stormwater discharge;
- Probable sources of any observed stormwater contamination (if applicable);
- If applicable, why it was not possible to take a sample within the first 30 minutes of the storm event.

The EPC-CP Group Leader has signed the certification statement to meet the duly authorized signatory requirements for the QVA contained in Attachment 1.



EPC-DO: 19-199 Jillian Burgin

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

<u>Taunia Van Valkenburg, EPC-CP Group Leader</u> Los Alamos National Laboratory

Manager Signature

Date

Please contact Holly Wheeler at 667-1312 (hbenson@lanl.gov) if you have questions regarding the QVA documentation. Thank you for your assistance in meeting the requirements of the Laboratory's NPDES 2015 MSGP.

Facility Name	Sampling Station	Work Order#
TA-3-38 Carpenter Shop	MSGP07401	MSGP-63618

TWL/HLW:jdm

Attachment(s): Attachment 1 Quarterly Visual Assessment Form, First Quarter, 2019
Monitoring Year



EPC-DO: 19-199 Jillian Burgin

Copy: Michael Hazen, ALDESHQSS, mhazen@lanl.gov, (E-File)

Terrill Lemke, EPC-CP, tlemke@lanl.gov, (E-File)

William Mairson, ALDESHQSS, wrmairson@lanl.gov, (E-File)

Russell Stone, DESH-UIS, <u>rdstone@lanl.gov</u>, (E-File) Enrique Torres, EPC-DO, <u>etorres@lanl.gov</u>, (E-File)

Taunia Van Valkenburg, EPC-CP, tauniav@lanl.gov, (E-File)

Adesh-records@lanl.gov, (E-File) epc-correspondence@lanl.gov, (E-File)



# **ATTACHMENT 1**

Quarterly Visual Assessment Form, First Quarter, 2019 Monitoring Year

EPC-DO: 19-199

Date:	JUL 0 3 2019	

Maintenance Details

### Work Order MSGP-63618

MSGP Monitoring Stations Printed 5/21/2019 - 4:35 PM

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sks								
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I confirm the information as recorded is true, accurate and complete.

#### **CERTIFICATION STATEMENT**

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

(Signatory must	meet definition in Section B.11.A	a, eg. FOD, Ops Mgr, DESH Group Leader, EPC Group Leader	)
Print name and ti	tle: <u>Taunia Van Valkenburg, E</u>	PC-CP Group Leader	
Signature:	(See signature on file)	Date:	



Environmental Protection & **Compliance Programs** 

To: Jillian Burgin, DESH-UIS, B274

Thru: Terrill Lemke, EPC-CP, K490 %

From: Holly Wheeler, EPC-CP, K490 WW

Phone: 505-667-1312 Symbol: EPC-DO: 19-308

Date:

SEP 0 3 2019

Subject: National Pollutant Discharge Elimination System (NPDES) Permit Tracking No. NMR050013, Multi-Sector General Permit (MSGP) Quarterly Visual Assessment (OVA) Forms for June and July of 2019 for the TA-3-38 Carpenter Shop

Please find attached completed MSGP QVA forms documenting visual assessments performed during the second quarter of monitoring at the TA-3-38 Carpenter Shop. Per Parts 3.2.2 and 5.5 of the 2015 MSGP, the signed certification statement and associated QVA forms shall be incorporated into your MSGP Stormwater Pollution Prevention Plan (SWPPP).

Part 3.2.1 of the 2015 MSGP requires the visual assessment of stormwater discharge samples collected from each outfall once each quarter for the entire permit term. Part 3.2.3 allows facilities that are located in an area with a semi-arid climate and/or in an area where freezing conditions exist for an extended period to distribute the quarterly visual assessments during seasons when precipitation runoff occurs. Accordingly, Triad National Security, LLC (Triad) has designated the following MSGP monitoring quarters.

Ouarter 1: April – May Quarter 2: June – July

Quarter 3: August – September Quarter 4: October - November

The attached QVA forms document the following information required by Part 3.2.2 of the 2015 MSGP and were completed by Environmental Compliance Programs (EPC-CP) personnel.

- Sample location;
- Sample collection date and time, and visual assessment date and time for each sample;
- Personnel collecting the sample and performing the visual assessment, and their signatures;
- Nature of the discharge (i.e., runoff or snowmelt);
- Results of observations of the stormwater discharge;
- Probable sources of any observed stormwater contamination (if applicable);
- If applicable, why it was not possible to take a sample within the first 30 minutes of the storm event.

The EPC-CP Group Leader has signed the certification statement to meet the duly authorized signatory requirements for QVAs contained in Attachment 1.



EPC-DO: 19-308 Jillian Burgin

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

Taunia Van Valkenburg, EPC-CP Group Leader

Los Alamos National Laboratory

Manager Signature

932019 Date

Please contact Holly Wheeler at 667-1312 (hbenson@lanl.gov) if you have questions regarding the QVA documentation. Thank you for your assistance in meeting the requirements of the Laboratory's NPDES 2015 MSGP.

Facility Name	Sampling Station	Work Order #
TA-3-38 Carpenter Shop	MSGP07301	MSGP-63635
TA-3-38 Carpenter Shop	MSGP07401	MSGP-63804

TWL/HLW:jdm

Attachment(s): Attachment 1 Quarterly Visual Assessment Forms, Second Quarter, 2019 Monitoring Year

Copy: Michael Hazen, ALDESHQSS, mhazen@lanl.gov William Mairson, ALDESHQSS, wrmairson@lanl.gov

Russell Stone, DESH-UIS, rdstone@lanl.gov Enrique Torres, EPC-DO, etorres@lanl.gov

Jennifer Payne, EPC-DO, jpayne@lanl.gov

Taunia Van Valkenburg, EPC-CP, tauniav@lanl.gov

Terrill Lemke, EPC-CP, tlemke@lanl.gov

Adesh-records@lanl.gov epccorrespondence@lanl.gov



# **ATTACHMENT 1**

# Quarterly Visual Assessment Forms, Second Quarter, 2019 Monitoring Year

EPC-DO: 19-308

Date:	SEP 0 3 2019
Daic.	OLI U U EUIJ

Maintenance Details

### Work Order MSGP-63635

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#### **CERTIFICATION STATEMENT**

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

### Work Order MSGP-63804

Maintenand	ce Details						oring Statio 19 - 4:34 P
	<b>3y:</b> Banar, Alethea on 7/2/2019 5:19:00 PM	Target: 7/31/2019 Priority/Type: / Inspection	MSGF     品 RG12				
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Last PM:	7/2/2019						
Project:	Visual Assessments 6/1/19 (P-MSGP-5378)		Contact: Phone:		ethea		
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<b>Report:</b> Mar	win Shendo						
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Attachment 1

Date

#### **CERTIFICATION STATEMENT**

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

(Signatory must meet definition in Section B.11.A, eg. FOD, Ops Mgr, DESH Group Leader, EPC Group Leader)

Print name and title: Taunia Van Valkenburg, EPC-CP Group Leader

Signature: Osee Signature on file Date:



memorandum

Environmental Protection &

Compliance Division

Compliance Programs Group

To: Jillian Burgin, DESH-UIS, B274

Thru: Terrill Lemke, EPC-CP, K490

From: Holly Wheeler, EPC-CP, K490' - W

Phone: 505-667-1312 Symbol: EPC-DO: 19-377

Date: NOV 2 6 2019

Subject: National Pollutant Discharge Elimination System (NPDES) Permit Tracking No.

NMR050013, Multi-Sector General Permit (MSGP) Quarterly Visual Assessment

(QVA) Forms for August and September of 2019 for the TA-3-38 Carpenter

Shop

Please find attached a completed MSGP QVA forms documenting a visual assessment performed during the third quarter of monitoring at the TA-3-38 Carpenter Shop. Per Parts 3.2.2 and 5.5 of the 2015 MSGP, the signed certification statement and associated QVA forms shall be incorporated into your MSGP Stormwater Pollution Prevention Plan (SWPPP).

Part 3.2.1 of the 2015 MSGP requires the visual assessment of stormwater discharge samples collected from each outfall once each quarter for the entire permit term. Part 3.2.3 allows facilities that are located in an area with a semi-arid climate and/or in an area where freezing conditions exist for an extended period to distribute the quarterly visual assessments during seasons when precipitation runoff occurs. Accordingly, Triad National Security, LLC (Triad) has designated the following MSGP monitoring quarters.

Quarter 1: April – May Quarter 2: June – July

Quarter 3: August – September Quarter 4: October - November

The attached QVA forms document the following information required by Part 3.2.2 of the 2015 MSGP and were completed by Environmental Compliance Programs (EPC-CP) personnel.

- Sample location;
- Sample collection date and time, and visual assessment date and time for each sample;
- Personnel collecting the sample and performing the visual assessment, and their signatures;
- Nature of the discharge (i.e., runoff or snowmelt);
- Results of observations of the stormwater discharge;
- Probable sources of any observed stormwater contamination (if applicable);
- If applicable, why it was not possible to take a sample within the first 30 minutes of the storm event.

The EPC-CP Group Leader has signed the certification statement to meet the duly authorized signatory requirements for the QVAs contained in Attachment 1.



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

Taunia Van Valkenburg, EPC-CP Group Leader

Los Alamos National Laboratory

Manager Signature

11 25 19 Date

Please contact Holly Wheeler at 667-1312 (hbenson@lanl.gov) if you have questions regarding the QVA documentation. Thank you for your assistance in meeting the requirements of the Laboratory's NPDES 2015 MSGP.

Facility Name	Sampling Station	Work Order #	
TA-3-38 Carpenter Shop	MSGP07401	MSGP-63887	
TA-3-38 Carpenter Shop	MSGP07301	MSGP-63900	

TWL/HLW:jdm

Attachment(s): Attachment 1 Quarterly Visual Assessment Forms, Third Quarter, 2019
Monitoring Year

Copy: Michael Hazen, ALDESHQSS, mhazen@lanl.gov

William Mairson, ALDESHQSS, wrmairson@lanl.gov

Enrique Torres, EPC-DO, etorres@lanl.gov Jennifer Payne, EPC-DO, jpayne@lanl.gov Russell Stone, DESH-UIS, rdstone@lanl.gov

Taunia Van Valkenburg, EPC-CP, tauniav@lanl.gov

Terrill Lemke, EPC-CP, tlemke@lanl.gov

epccorrespondence@lanl.gov adesh-records@lanl.gov



# **ATTACHMENT 1**

Quarterly Visual Assessment Forms, Third Quarter, 2019 Monitoring Year

EPC-DO: 19-377

Date:	NOV 2 6 2019

#### Work Order MSGP-63887

MSGP Monitoring Stations Printed 8/21/2019 - 9:26 AM

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Requested I	By: Dale, Leslie on 8/8/2019 9:58:00 AM	Target: Priority/Type:	9/30/2019 / Inspection	MSGP				
Taken By: Procedure:	Dale, Leslie  Department: Utilities and Infrastructure  MSGP Quarterly Visual		TA-3-3 Monito	TA-3-38 Carpenter Shop Monitored Outfall (074) MSGP07401				
.ast PM:	8/7/2019			044-	S-I- 1 6-			
Project:	Visual Assessments 8/1/19 (P-MSGP-5390)			Phone:	Dale, Leslie			
Reason: M	SGP Quarterly Visual Assessme	nt						
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#### **CERTIFICATION STATEMENT**

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

(Signatory must meet definition in Section B.11.A, e	g. FOD, Ops Mgr, DESH Group Leader, EPC Group Lea	der)
Print name and title: <u>Taunia Van Valkenburg, EPC</u>	-CP Group Leader	
Signature:(See signature on file)	Date:	

### Work Order MSGP-63900

MSGP Monitoring Stations Printed 10/3/2019 - 5:56 PM

	: 8/14/2019 12:39:00 PM MSGP Quarterly Visual Assessment (EPC-CP-Form- 1021.2) 8/20/2019 Visual Assessments 8/1/19 (P- MSGP-5390)	Target: 9/30/2019 Priority/Type: / Inspection Department: Utilities and Infrastructu	Monito	1.9 8 Carpente ored Outfall antially Iden	(074)		73)
Reason: N	1SGP Quarterly Visual Assessme	ent	Contact: Phone:				
asks							
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#### **CERTIFICATION STATEMENT**

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

(Signatory m	ust meet definition in Section B.11.A, eg	. FOD, Ops Mgr, DESH Group Leader, EPC Group Lead	ler)
Print name an	d title: <u>Taunia Van Valkenburg, EPC-</u>	CP Group Leader	
Signature:	(See signature on file)	Date:	



memorandum

Environmental Protection & Compliance Division

Compliance Programs Group

To: Russell Stone, DESH-UIS, K760

Thru: Terrill Lemke, EPC-DO, K490

From: Holly Wheeler, EPC-CP, K490 \( \sqrt{\lambda} \)

Phone: 505-667-1312 Symbol. EPC-DO: 19-455

Date: JAN 0 8 2020

Subject: National Pollutant Discharge Elimination System (NPDES) Permit Tracking No. NMR050013, Multi-Sector General Permit (MSGP) Quarterly Visual Assessment (QVA) Forms for October and November of 2019 for the TA-3-38 Carpenter

Please find attached completed MSGP QVA forms documenting visual assessments performed during the fourth quarter of monitoring at the TA-3-38 Carpenter Shop. Per Parts 3.2.2 and 5.5 of the 2015 MSGP, the signed certification statement and associated QVA forms shall be incorporated into your MSGP Stormwater Pollution Prevention Plan (SWPPP).

Part 3.2.1 of the 2015 MSGP requires the visual assessment of stormwater discharge samples collected from each outfall once each quarter for the entire permit term. Part 3.2.3 allows facilities that are located in an area with a semi-arid climate and/or in an area where freezing conditions exist for an extended period to distribute the quarterly visual assessments during seasons when precipitation runoff occurs. Accordingly, Triad National Security, LLC (Triad) has designated the following MSGP monitoring quarters.

Ouarter 2: Ouarter 1: April – May June – July

Quarter 3: August – September October - November Ouarter 4:

The attached QVA forms document the following information required by Part 3.2.2 of the 2015 MSGP and were completed by Environmental Compliance Programs (EPC-CP) personnel.

- Sample location;
- Sample collection date and time, and visual assessment date and time for each sample;
- Personnel collecting the sample and performing the visual assessment, and their signatures;
- Nature of the discharge (i.e., runoff or snowmelt);
- Results of observations of the stormwater discharge;
- Probable sources of any observed stormwater contamination (if applicable);
- If applicable, why it was not possible to take a sample within the first 30 minutes of the storm event.

The EPC-CP Group Leader has signed the certification statement to meet the duly authorized signatory requirements for the OVAs contained in Attachment 1.



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

Taunia Van Valkenburg, EPC-CP Group Leader

Los Alamos National Laboratory

Manager Signature

Please contact Holly Wheeler at 667-1312 (hbenson@lanl.gov) if you have questions regarding the QVA documentation. Thank you for your assistance in meeting the requirements of the Laboratory's NPDES 2015 MSGP.

Facility Name	Sampling Station	Work Order #
TA-3-38 Carpenter Shop	MSGP07301	MSGP-63977
TA-3-38 Carpenter Shop	MSGP07401	MSGP-64006

TWL/HLW:jdm

Attachment(s): Attachment 1 Quarterly Visual Assessment Forms, Fourth Quarter, 2019
Monitoring Year

Copy: Michael Hazen, ALDESHQSS, <u>mhazen@lanl.gov</u>
William Mairson, ALDESHQSS, <u>wrmairson@lanl.gov</u>
Enrique Torres, EWP, <u>etorres@lanl.gov</u>

Jennifer Payne, EPC-DO, jpayne@lanl.gov

Taunia Van Valkenburg, EPC-CP, tauniav@lanl.gov

Terrill Lemke, EPC-CP, tlemke@lanl.gov

epccorresondence@lanl.gov adesh-records@lanl.gov



# **ATTACHMENT 1**

Quarterly Visual Assessment Forms, Fourth Quarter, 2019 Monitoring Year

EPC-DO: 19-455

Date: \_\_\_\_\_\_ JAN 0 8 2020

**Maintenance Details** 

### Work Order MSGP-63977

MSGP Monitoring Stations Printed 10/28/2019 - 2:28 PM (Duplicate Copy)

Assessment (EPC-CP-Form- 1021.2) 8/20/2019 Visual Assessments 10/1/19 (P-MSGP-5407)	Priority/Type: Department:	/ Inspection Utilities and Infrastructure	Monito Substa	38 Carpent ored Outfal antially Ider	(074)		073)
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CERTIF	ICATIO	N STA'	TEMENT

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

(Signatory m	nust meet definition in Section B.11.A, eg	; FOD, Ops Mgr, DESH Group Lead	der, EPC Group Leader)
Print name an	nd title: <u>Taunia Van Valkenburg, EPC-</u>	CP Group Leader	<u>.</u>
Signature:	(See signature on file)	Date:	

**Maintenance Details** 

### Work Order MSGP-64006

MSGP Monitoring Stations Printed 10/28/2019 - 2:27 PM

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	FPC-D	O: 19-455		Attachment 1				3	

#### **CERTIFICATION STATEMENT**

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

(Signatory m	nust meet definition in Section B.11.A, eg	. FOD, Ops Mgr, DESH Group Leader, EPC Group	Leader)
Print name an	nd title: <u>Taunia Van Valkenburg, EPC-</u>	CP Group Leader	
Signature:	(See signature on file)	Date:	



Environmental Protection & Compliance Division Compliance Programs Group

To: Jillian Burgin, DESH-UIS, B274

Thru: Terrill Lemke, EPC-CP, K490

From: Holly Wheeler, EPC-CP, K490

Phone: 505-667-1312 Symbol: EPC-DO: 19-200

Date:

JUI 0 3 2019

Subject: National Pollutant Discharge Elimination System (NPDES) Permit Tracking No. NMR050013, Multi-Sector General Permit (MSGP) Quarterly Visual Assessment (QVA) Form for April and May of 2019 for the TA-3-38 Metals Fabrication Shop

Please find attached the completed MSGP QVA form documenting a visual assessment performed during the first quarter of monitoring at the TA-3-38 Metals Fabrication Shop. Per Parts 3.2.2 and 5.5 of the 2015 MSGP, the signed certification statement and associated QVA form shall be incorporated into your MSGP Stormwater Pollution Prevention Plan (SWPPP).

Part 3.2.1 of the 2015 MSGP requires the visual assessment of stormwater discharge samples collected from each outfall once each quarter for the entire permit term. Part 3.2.3 allows facilities that are located in an area with a semi-arid climate and/or in an area where freezing conditions exist for an extended period to distribute the quarterly visual assessments during seasons when precipitation runoff occurs. Accordingly, Triad National Security, LLC (Triad) has designated the following MSGP monitoring quarters.

Quarter 1: April – May Quarter 2: June – July

Quarter 3: August – September Quarter 4: October - November

The attached QVA form documents the following information required by Part 3.2.2 of the 2015 MSGP and was completed by Environmental Compliance Programs (EPC-CP) personnel.

- Sample location;
- Sample collection date and time, and visual assessment date and time for each sample;
- Personnel collecting the sample and performing the visual assessment, and their signatures;
- Nature of the discharge (i.e., runoff or snowmelt):
- Results of observations of the stormwater discharge:
- Probable sources of any observed stormwater contamination (if applicable);
- If applicable, why it was not possible to take a sample within the first 30 minutes of the storm event.

The EPC-CP Group Leader has signed the certification statement to meet the duly authorized signatory requirements for the QVA contained in Attachment 1.



EPC-DO: 19-200 Jillian Burgin

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

Taunia Van Valkenburg, EPC-CP Group Leader Los Alamos National Laboratory

Du She for Tov 7/3/19

Please contact Holly Wheeler at 667-1312 (hbenson@lanl.gov) if you have questions regarding the QVA documentation. Thank you for your assistance in meeting the requirements of the Laboratory's NPDES 2015 MSGP.

Facility Name	Sampling Station	Work Order #
TA-3-38 Metals Fabrication Shop	MSGP00201	MSGP-63608

TWL/HLW:jdm

Attachment(s): Attachment 1 Quarterly Visual Assessment Form, First Quarter, 2019 Monitoring Year

Copy: Michael Hazen, ALDESHQSS, mhazen@lanl.gov, (E-File)

Terrill Lemke, EPC-CP, tlemke@lanl.gov, (E-File)

William Mairson, ALDESHQSS, wrmairson@lanl.gov, (E-File)

Russell Stone, DESHS-UIS, rdstone@lanl.gov, (E-File)

Enrique Torres, EPC-DO, etorres@lanl.gov, (E-File)

Taunia Van Valkenburg, EPC-CP, tauniav@lanl.gov, (E-File)

adesh-records@lanl.gov, (E-File)

epc-correspondence@lanl.gov, (E-File)



# **ATTACHMENT 1**

Quarterly Visual Assessment Form, First Quarter, 2019 Monitoring Year

EPC-DO: 19-200

Date:	JUL 0 3 2019

### Work Order MSGP-63608

MSGP Monitoring Stations Printed 5/21/2019 - 3:44 PM

	l: 4/23/2019 3:16:00 PM	MSGP Program			
-	-	RG121.9			
	Assessment (EPC-CP-Form- Department: Utilities and Infrastructure	TA-3-38 Metals I			
ast PM:	EP4	Monitored Outfa	II (002)		
roject:	Visual Assessments	MSGP00201			
. 0,001.	4/1/2019 (P-MSGP-5366)				
)		ontact:			
eason. N	VISOR Quarterly Visual Assessment	none:			
sks					
# De	escription	Meas.	No	N/A	Yes
he result	of this VA applies to associated SIOs as defined in the SWPPP, where appli	cable.			
	formation	Apr. May	_	_	To a
	ocument the monitoring Period (e.g., Apr-May) ocument the Date/Time Discharge began in the "Reading" field of this line (using	Apr-May 4/22/19 @	79	<u>.</u>	
0 <u>m</u> i	m/dd/yy hh:mm format).	21:18			
0 <u>m</u> ı	ocument the Date/time sample collected in the "Reading" field of this line (using m/dd/yy hh:mm format).	4/22/19 @ 21:18			V
	ocument the Date/time sample visually assessed in the "Reading" field of this line ising mm/dd/yy hh:mm format).	4/23/19 @ 09:27			W
	ocument the nature of discharge (e.g., rain, snowmelt). Document the TOTAL among in the "Reading" field of this line.	ount rain 0.74		П	
	ample collected in first 30 minutes of discharge? If "Failed" or unknown, provide a				
0 rea	ason.				
arameter	s				
10 Is	sample colorless? If "Failed", describe.	blackish	TAX .		
	sample oderless? If "Failed", provide description (e.g. musty, sewage, sulfur, sou bivent, petroleum/gas)	r, motor oil	13%		
30 Is	sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque	e). poaque	130		
Is	sample free of floating solids? If "Failed", describe if raw or waste material(s) in the mments of this line.			П	r/
	sample free of settled solids? If "Failed", provide description (e.g., fine, course).	Fine	132		
	sample free of suspended solids? If "Failed", provide description (e.g., fine, course				W
	sample foamless after gently shaking? If "Failed" describe foam color and locatio				
	.g.,'on the surface' or 'in the sample').	surface	134		
	sample devoid of an oil sheen? If "Failed", describe color and thickness (e.g. flect				_
ls	obs).	Flecks			

#### **CERTIFICATION STATEMENT**

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

(Signatory must meet definition in Section B.11.A, eg. FOD, Ops Mgr, DESH Group Leader, EPC Group Leader)	
Print name and title: Taunia Van Valkenburg, EPC-CP Group Leader	
Signature: (See signature on file)	Date:

EPC-DO: 19-200 Attachment 1



Environmental Protection & Compliance Division Compliance Programs

To: Jillian Burgin, DESH-UIS, B274

Thru: Terrill Lemke, EPC-CP, K490 W

From: Holly Wheeler, EPC-CP, K490 White

Phone: 505-667-1312 Symbol: EPC-DO: 19-311

Date: SEP 0 3 2019

Subject: National Pollutant Discharge Elimination System (NPDES) Permit Tracking No. NMR050013, Multi-Sector General Permit (MSGP) Quarterly Visual Assessment (QVA) Form for June and July of 2019 for the TA-3-38 Metals Fabrication Shop

Please find a completed MSGP QVA form attached documenting a visual assessment performed during the second quarter of monitoring at the TA-3-38 Metals Fabrication Shop. Per Parts 3.2.2 and 5.5 of the 2015 MSGP, the signed certification statement and associated QVA form shall be incorporated into your MSGP Stormwater Pollution Prevention Plan (SWPPP).

Part 3.2.1 of the 2015 MSGP requires the visual assessment of stormwater discharge samples collected from each outfall once each quarter for the entire permit term. Part 3.2.3 allows facilities that are located in an area with a semi-arid climate and/or in an area where freezing conditions exist for an extended period to distribute the quarterly visual assessments during seasons when precipitation runoff occurs. Accordingly, Triad National Security, LLC (Triad) has designated the following MSGP monitoring quarters.

Quarter 1: April – May Quarter 2: June – July

Quarter 3: August – September Quarter 4: October - November

The attached QVA form documents the following information required by Part 3.2.2 of the 2015 MSGP and was completed by a representative of Environmental Compliance Programs (EPC-CP).

- Sample location;
- Sample collection date and time, and visual assessment date and time for each sample;
- Personnel collecting the sample and performing the visual assessment, and their signatures;
- Nature of the discharge (i.e., runoff or snowmelt);
- Results of observations of the stormwater discharge;
- Probable sources of any observed stormwater contamination (if applicable);
- If applicable, why it was not possible to take a sample within the first 30 minutes of the storm event.

The EPC-CP Group Leader has signed the certification statement to meet the duly authorized signatory requirements for the QVA contained in Attachment 1.



EPC-DO: 19-311 Jillian Burgin

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

Taunia Van Valkenburg, EPC-CP Group Leader

Los Alamos National Laboratory

Manager Signature

9/3/2019 Date

Please contact Holly Wheeler at 667-1312 (hbenson@lanl.gov) if you have questions regarding the QVA documentation. Thank you for your assistance in meeting the requirements of the Laboratory's NPDES 2015 MSGP.

Facility Name	Sampling Station	Work Order #
TA-3-38 Metals Fabrication Shop	MSGP07601	MSGP-63607

TWL/HLW:jdm

Attachment(s): Attachment 1 Quarterly Visual Assessment Form, Second Quarter, 2019 Monitoring Year

Copy: Michael Hazen, ALDESHQSS, mhazen@lanl.gov
William Mairson, ALDESHQSS, wrmairson@lanl.gov
Russell Stone, DESHS-UIS, rdstone@lanl.gov
Enrique Torres, EPC-DO, etorres@lanl.gov
Jennifer Payne, EPC-DO, jpayne@lanl.gov
Taunia Van Valkenburg, EPC-CP, tauniav@lanl.gov

Terrill Lemke, EPC-CP, tlemke@lanl.gov

adesh-records@lanl.gov epccorrespondence@lanl.gov



# **ATTACHMENT 1**

Quarterly Visual Assessment Form, Second Quarter, 2019 Monitoring Year

EPC-DO: 19-311

Date:	SEP 0 3 2019

## Los Alamos National Laboratory

Maintenance Details

#### Work Order MSGP-63607

MSGP Monitoring Stations Printed 8/2/2019 - 4:35 PM

_	Visual Assessments 6/1/19		7/31/2019 Normal / Inspection Utilities and Infrastructure	MSGP Progr 品 RG121.9 ♣ TA-3-38 Meta ♣ Monitored Ou ♣ MSGP07601	ıls Fab Sh		
Reason:	(P-MSGP-5378)  MSGP Quarterly Visual Assessm	nent		Contact: Phone:			
asks							
#	Description			Meas	. No	N/A	Yes
The res	ult of this VA applies to associat	ed SIOs as defi	ned in the SWPPP, where a	pplicable.			
-	information						
30	Document the monitoring Period (			jun-ju			
10	Document the Date/Time Discharg mm/dd/yy hh:mm format).	je pegan in the	Reading" field of this line (us	sing 6/17/1 15:45			
	Document the Date/time sample comm/dd/yy hh:mm format).	collected in the "	Reading" field of this line (us		9		TV.
30	Document the Date/time sample v (using mm/dd/yy hh:mm format).			14:37			
<u>'0                                    </u>	Document the nature of discharge (in) in the "Reading" field of this lin	ie.		rain 0.0	5		
	Sample collected in first 30 minute reason.	es of discharge?	If "Failed" or unknown, provi	de a			
Paramet	ters						
	Is sample colorless? If "Failed", de			brown			
20	Is sample oderless? If "Failed", prosolvent, petroleum/gas)						10
	Is sample clear? If "Failed", provid				• <b> </b>		
40	Is sample free of floating solids? If comments of this line.	"Failed", descri	pe if raw or waste material(s)	in the			re/
	Is sample free of settled solids? If	"Failed", provide	description (e.g., fine, cours	e). fine	132		
	Is sample free of suspended solids						10/
	Is sample foamless after gently sha (e.g.,'on the surface' or 'in the sam		" describe foam color and lo	cation		П	10
80	Is sample devoid of an oil sheen? globs).			flecks,			
90	ls sample free of other obvious ind	icators of polluti	on? If "Failed", describe.				
•	eport  ed: 6/18/2019 2:37:00 PM  Marwin Shendo						
<i>\</i>	Signature / Name	6/19/2019 Date	Signatur	e / Name	3 I <del></del>	Date	
OUTI <b>rm</b> EP	the information as recorded is to C-DO: 19-311		nd complete. Attachment 1			1	

CERTIFIC	ATION	STAT	TEMENT

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

(Signatory must meet definition in Section B.11.A	A, eg. FOD, Ops Mgr, DESH Group Leader, EPC Group Leader)
Print name and title: <u>Taunia Van Valkenburg, E</u>	PC-CP Group Leader
Signature: (See signature on file)	Date:



**Environmental Protection &** Compliance Division

Compliance Programs Group

To: Jillian Burgin, DESH-UIS, B274

Thru: Terrill Lemke, EPC-CP, K490 W

From: Holly Wheeler, EPC-CP, K490

Phone: 505-667-1312 Symbol: EPC-DO: 19-378 NOV 2 6 2019

Date:

Subject: National Pollutant Discharge Elimination System (NPDES) Permit Tracking No. NMR050013, Multi-Sector General Permit (MSGP) Quarterly Visual Assessment (QVA) Form for August and September of 2019 for the TA-3-38 Metals **Fabrication Shop** 

Please find attached the completed MSGP QVA form documenting a visual assessment performed during the third quarter of monitoring at the TA-3-38 Metals Fabrication Shop. Per Parts 3.2.2 and 5.5 of the 2015 MSGP, the signed certification statement and associated QVA form shall be incorporated into your MSGP Stormwater Pollution Prevention Plan (SWPPP).

Part 3.2.1 of the 2015 MSGP requires the visual assessment of stormwater discharge samples collected from each outfall once each quarter for the entire permit term. Part 3.2.3 allows facilities that are located in an area with a semi-arid climate and/or in an area where freezing conditions exist for an extended period to distribute the quarterly visual assessments during seasons when precipitation runoff occurs. Accordingly, Triad National Security, LLC (Triad) has designated the following MSGP monitoring quarters.

April – May Quarter 1: Quarter 2: June – July

Ouarter 3: August – September Quarter 4: October - November

The attached QVA form documents the following information required by Part 3.2.2 of the 2015 MSGP and was completed by Environmental Compliance Programs (EPC-CP) personnel.

- Sample location:
- Sample collection date and time, and visual assessment date and time for each sample;
- Personnel collecting the sample and performing the visual assessment, and their signatures;
- Nature of the discharge (i.e., runoff or snowmelt);
- Results of observations of the stormwater discharge;
- Probable sources of any observed stormwater contamination (if applicable);
- If applicable, why it was not possible to take a sample within the first 30 minutes of the storm event.

The EPC-CP Group Leader has signed the certification statement to meet the duly authorized signatory requirements for the QVA contained in Attachment 1.



EPC-DO: 19-378 Jillian Burgin

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

Taunia Van Valkenburg, EPC-CP Group Leader

Los Alamos National Laboratory

Manager Signatur

11 25 19 Date

Please contact Holly Wheeler at 667-1312 (hbenson@lanl.gov) if you have questions regarding the QVA documentation. Thank you for your assistance in meeting the requirements of the Laboratory's NPDES 2015 MSGP.

Facility Name	Sampling Station	Work Order #
TA-3-38 Metals Fabrication Shop	MSGP07601	MSGP-63888

TWL/HLW:jdm

Attachment(s): Attachment 1 Quarterly Visual Assessment Form, Third Quarter, 2019
Monitoring Year

Copy: Michael Hazen, ALDESHQSS, <u>mhazen@lanl.gov</u> William Mairson, ALDESHQSS, <u>wrmairson@lanl.gov</u>

Enrique Torres, EPC-DO, etorres@lanl.gov
Jennifer Payne, EPC-DO, jpayne@lanl.gov
Russell Stone, DESH-UIS, rdstone@lanl.gov

Taunia Van Valkenburg, EPC-CP, tauniav@lanl.gov

epccorrespondence@lanl.gov adesh-records@lanl.gov



# **ATTACHMENT 1**

Quarterly Visual Assessment Form, Third Quarter, 2019 Monitoring Year

EPC-DO: 19-378

Date: \_\_\_\_\_\_NOV 2 6 2019

## Los Alamos National Laboratory

Maintenance Details ----

#### Work Order MSGP-63888

MSGP Monitoring Stations Printed 8/21/2019 - 9:25 AM

Taken By: Dale, Leslie D Procedure: MSGP Quarterly Visual Assessment (EPC-CP-		10:01:00 AM Priority/Type: / Inspection Dale, Leslie  MSGP Quarterly Visual  Priority/Type: / Inspection Department: Utilities and Infrastructure  Monitority/Type: / Inspection  A RG12  Monitority/Type: / Inspection			i.9 8 Metals Fa red Outfall (		)	
Last PM: 8/7/2019  Project: Visual Assessments 8/1/19 Contact: (P-MSGP-5390) Phone:								
Reason:	MSGP Quarterly Visual Assessme	nt						
asks								
	Description				Meas.	No	N/A	Yes
	t of this VA applies to associated oformation	l SIOs as define	ed in the SWPPP, where app	licable.				
-	ocument the monitoring Period (e.	g Apr-May)			Aug-Sept			10
D	Document the Date/Time Discharge h:mm format).		eading" field of this line (using	g mm/dd/yy	8/6/19, 1732			
50 h	ocument the Date/time sample col h:mm format).				8/6/19, 1732			10
0 <u>m</u>	ocument the Date/time sample visom/dd/yy hh:mm format).				8/7/19, 1448			V
<u>'0 th</u>	ocument the nature of discharge (enterpolation of this line.				rain, 0.18"	2		V
	ample collected in first 30 minutes	of discharge? If	"Failed" or unknown, provide	a reason.		7	À	
Paramete	rs				Dark			
	sample colorless? If "Failed", desc				Brown	JAC _		1024
20 pe	s sample oderless? If "Failed", prov etroleum/gas)					, , , , , , , , , , , , , , , , , , ,		100
30 Is	sample clear? If "Failed", provide	description (e.g.	, slightly cloudy, cloudy, opaq	ue).	cloudy	134		
	sample free of floating solids? If "I omments of this line.	Failed", describe	if raw or waste material(s) in	the	fine	TM.	- interest	
	sample free of settled solids? If "F	- interessination			fine	_124		
	sample free of suspended solids?				fine	IM.		
70 th	sample foamless after gently shak e surface' or 'in the sample').					, S		
	sample devoid of an oil sheen? If			cks, globs).		-3		10
90 <u>Is</u>	sample free of other obvious indic	ators of pollution	? If "Failed", describe.					1
•	ntonio Trujillo							
Ū	WW (North	8/14/2019		···· / Na			Del	
onfirm th	Signature / Name ne information as recorded is tru	Date e, accurate and	Signatu I <b>complete.</b>	re / Name			Date	

#### **CERTIFICATION STATEMENT**

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

(Signatory m	nust meet definition in Section B.11.A, eg	. FOD, Ops Mgr, DESH Group Lea	der, EPC Group Leader)
Print name an	nd title: Taunia Van Valkenburg, EPC-	CP Group Leader	
Signature:	(See signature on file)	Date:	



memorandum

Environmental Protection & Compliance Division

Compliance Programs Group

To: Russell Stone, DESH-UIS, K760

Thru: Terrill Lemke, EPC-DO, K490

From: Holly Wheeler, EPC-CP, K490

*Phone:* 505-667-1312 *Symbol:* EPC-DO: 19-456

Date: JAN 1 0 2020

Subject: National Pollutant Discharge Elimination System (NPDES) Permit Tracking No. NMR050013, Multi-Sector General Permit (MSGP) Quarterly Visual Assessment (QVA) for October and November of 2019 for the TA-3-38 Metals Fabrication Shop

Please find attached the completed MSGP QVA form documenting a visual assessment performed during the fourth quarter of monitoring at the TA-3-38 Metals Fabrication Shop. Per Parts 3.2.2 and 5.5 of the 2015 MSGP, the signed certification statement and associated QVA form shall be incorporated into your MSGP Stormwater Pollution Prevention Plan (SWPPP).

Part 3.2.1 of the 2015 MSGP requires the visual assessment of stormwater discharge samples collected from each outfall once each quarter for the entire permit term. Part 3.2.3 allows facilities that are located in an area with a semi-arid climate and/or in an area where freezing conditions exist for an extended period to distribute the quarterly visual assessments during seasons when precipitation runoff occurs. Accordingly, Triad National Security, LLC (Triad) has designated the following MSGP monitoring quarters.

Quarter 1: April – May Quarter 2: June – July

Quarter 3: August – September Quarter 4: October - November

The attached QVA form documents the following information required by Part 3.2.2 of the 2015 MSGP and was completed by Environmental Compliance Programs (EPC-CP) personnel.

- Sample location;
- Sample collection date and time, and visual assessment date and time for each sample;
- Personnel collecting the sample and performing the visual assessment, and their signatures;
- Nature of the discharge (i.e., runoff or snowmelt);
- Results of observations of the stormwater discharge;
- Probable sources of any observed stormwater contamination (if applicable);
- If applicable, why it was not possible to take a sample within the first 30 minutes of the storm event.

The EPC-CP Group Leader has signed the certification statement to meet the duly authorized signatory requirements for the QVA contained in Attachment 1.



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

Taunia Van Valkenburg, EPC-CP Group Leader

Los Alamos National Laboratory

Manager Signature

Please contact Holly Wheeler at 667-1312 (hbenson@lanl.gov) if you have questions regarding the QVA documentation. Thank you for your assistance in meeting the requirements of the Laboratory's NPDES 2015 MSGP.

Facility Name	Sampling Station	Work Order #
TA-3-38 Metals Fabrication Shop	MSGP07601	MSGP-64000

TWL/HLW:jdm

Attachment(s): Attachment 1 Quarterly Visual Assessment Form, Fourth Quarter, 2019

Monitoring Year

Copy: Michael Hazen, ALDESHQSS, mhazen@lanl.gov

William Mairson, ALDESHQSS, wrmairson@lanl.gov

Enrique Torres, EWP, etorres@lanl.gov

Jennifer Payne, EPC-DO, jpayne@lanl.gov

Taunia Van Valkenburg, EPC-CP, tauniav@lanl.gov

Terrill Lemke, EPC-CP, tlemke@lanl.gov

epccorresondence@lanl.gov adesh-records@lanl.gov



# **ATTACHMENT 1**

Quarterly Visual Assessment Form, Fourth Quarter, 2019 Monitoring Year

EPC-DO: 19-456

Date:	JAN 1 0 2020	

## Los Alamos National Laboratory

**Maintenance Details** 

#### Work Order MSGP-64000

MSGP Monitoring Stations Printed 10/28/2019 - 2:26 PM

Procedure: MSGP Quarterly Visual Assessment (EPC-CP-Form- 1021.2)  Priority/Type: Norm Department: Utiliti				11/30/2019 Normal / Inspection Utilities and Infrastructure	品 RG12 ▲ TA-3-	P Program 21.9 38 Metals ored Outfa	Fab Sh	•	
Last F		10/4/2019			MSG		(0,0)		
Projec	ct:	Visual Assessments 10/1/19 (P-MSGP-5407)			Contact:				
Reaso	on: N	ISGP Quarterly Visual Assessm	nent		Phone:				
asks	-								
#	De	escription				Meas.	No	N/A	Yes
The re	esult	of this VA applies to associate	ed SIOs as defi	ned in the SWPPP, where a	applicable.				
Samp	ole inf	ormation							
30		ocument the monitoring Period (				oct-nov			1
40	<u>mr</u>	ocument the Date/Time Discharg m/dd/yy hh:mm format).				10/4/19 04:30			TV.
50	mr	ocument the Date/time sample c m/dd/yy hh:mm format).				10/4/19 04:30			14
60	(us	ocument the Date/time sample v sing mm/dd/yy hh:mm format).				10/4/19 10:57			
70	(in	ocument the nature of discharge ) in the "Reading" field of this lin	ie.			rain .49			
80		imple collected in first 30 minute ason.	es of discharge?	If "Failed" or unknown, provi	de a				TV.
Paran	neters	3							
110	ls:	sample colorless? If "Failed", de	escribe.			brown	TM.	П	
120		sample oderless? If "Failed", pro lvent, petroleum/gas)	ovide description	n (e.g. musty, sewage, sulfur,	sour,	musty	134		
130	ls s	sample clear? If "Failed", provid	e description (e.	g., slightly cloudy, cloudy, op	aque).	opaque	120		
140		sample free of floating solids? If mments of this line.	"Failed", descril	be if raw or waste material(s)	) in the				1
150	ls s	sample free of settled solids? If	"Failed", provide	description (e.g., fine, cours	se).	fine	134		
160	ls s	sample free of suspended solids	? If "Failed", pro	ovide description (e.g., fine, o	course).				TV.
170		sample foamless after gently sh g.,'on the surface' or 'in the sam		" describe foam color and lo	cation	on the surface	[X		
180	glo	sample devoid of an oil sheen? bs).			flecks,				TV.
190	!s s	sample free of other obvious ind	icators of polluti	on? If "Failed", describe.					1
	leted:	: 10/4/2019 10:57:00 AM							
≺epor	N. ME	arwin Shendo	10/9/2019						
confir		ignature / Name e information as recorded is t	Date rue, accurate a	Signatur nd complete.	e / Name		-	Date	
	EDC.I	DO: 19-456		Attachment 1				1	

Attachment 1

#### **CERTIFICATION STATEMENT**

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

(Signatory m	ust meet definition in Section B.11.A, e	g. FOD, Ops Mgr, DESH Group Lea	der, EPC Group Leader)
Print name an	d title: Taunia Van Valkenburg, EPC	-CP Group Leader	
Signature:	(See signature on file)	Date:	

#### ATTACHMENT 9: CORRECTIVE ACTION DOCUMENTATION AND CERTIFICATION

### **CERTIFICATION FOR CORRECTIVE ACTIONS**

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

Printed Name: Russell Stone	Title: GC OCSH-UIS
Signature: Swall to	Date:

CAR#	FOD	MSGP Facility Desc	Inspection Date		CA Report Status	Finding	Finding Other Desc	Problem Description	Inspection Type	Inspection Type Other	Corrective Action Description	SIO	SIO Affected	Provide Action Taken at Affected SIOs	Is SWPPP Modification Required?	CA Initiate Date	CA Complete Date	Completed	CA Expected Date	CA Status Desc	EPA Notified Date (if 45 day time frame is exceeded.)
1443	UI	TA-3-38 Metals Fab. Shop	12/18/2018 14:10	NW corner of the shop by the fence at the TA-3-38 Metal Fabrication Shop.	t corrective	Control measures inadequate to meet non-numeric effluen limitations		Along the north fence of the TA-3-38 Metals Fabrication Shop, large metal pipe was stored without being covered.	s Routine facility inspection	y -	Cover the pipe or move it inside.	N	-	-	N	12/19/2018 11:00	12/19/2018 12:00	Y	-	Cover the pipe or move it inside. Pipe was covered 12/19/18.	-
1442	UI	TA-3-38 Metals Fab. Shop	12/18/2018 14:10	at the TA-3-38	A new corrective action	Control measures inadequate to meet non-numeric effluen limitations	t	Within the metal storage area at the TA-3-3 Metals Fabrication Shop, there was a rusted scale that is awaiting salvage/sale and a rusted sheet metal storage rack that need to be covered.	dinspection	y -	Cover the base of the scale until it is salvaged/sold and either cover or paint the sheet metal storage rack.	: <b>N</b>	-	-	N	12/20/2018 8:00	12/20/2018 9:00	Y	-	Cover the base of the scale until it is salvaged/sold and either cover or paint the sheet metal storage rack. Scale was sent to salvage 12/20/18.	-

#### **CERTIFICATION FOR CORRECTIVE ACTIONS**

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

Printed Name:	Russell Stone	Title:	ESH Managu 4
Signature:	Rue No Fe	Date:	1/36/2020

CAR# FOD MSGP Facility Desc	Inspection Date Specific Location	Inspector Name	Identifying Name	CA Report Status	Finding	Finding Other Desc	Problem Description	Inspection Type	Inspection Type Other	Corrective Action Description	SIO S	SIO Affected	Provide Action Taken at Affected SIOs	Swppp Modify	CA Initiate Date	CA Complete Date Comple	eted CA Expect Date		tus EPA Notified Date
1669 UI TA-3-38 Carpenter Shop	12/17/2019 11:00 West of the loading dock at TA 3-38 Carpenter Shop.	- SHENDO MARWIN P	MARWIN		Control measures inadequate to meet non-numeric effluent limitations	-	West of the loading dock at the TA-3-38 Carpenter Shop, a roll-off bin containing wood was not covered.	Routine facility inspection	-	The roll-off bin was covered.	N -		-	N	12/17/2019 11:00	12/17/2019 11:10 Y	-	N/A	-
1631 UI TA-3-38 Carpenter Shop	10/29/2019 12:00 South Fenceline Near Cyclone Unit		JILLIAN E		Other (describe):	Housekeeping	Trash has blown into the facility at the south fenceline, near the Stervnvent Cyclone.		-	Clean up trash along fenceline. Completed 10/30/19.	N -		-	N	10/30/2019 11:00	10/30/2019 11:30 Y	-	-	-
1533 UI TA-3-38 Carpenter Shop	5/31/2019 13:30 Near dock and around wood roll-off bin at the TA-3-38 Carpenter's Shop.		WHEELER HOLLY L		Control measures inadequate to meet non-numeric effluent limitations	-	Near the dock and around the wood roll-off bin at the TA-3-38 Carpenter's Shop, there are small pieces of metal, screws, bolts, wire and a solid piece of copper pipe on the ground.		Facility walk-down.	Clean up the small metal debris. Trash pick up or sweeping should be on a regular schedule, not on a reactive basis. SWPPP should be modified to implement this. 5/31/19: DEP notified the Carpenter Shop and Pipefitter shop of the CAR. The areas were cleaned up Monday 6/3/19.	N -		-	Y	6/3/2019 8:00	6/3/2019 16:00 Y	-	N/A	-
1528 UI TA-3-38 Carpenter Shop	5/22/2019 10:15 South of Cyclone Roll off Bin and Top of Bin		JILLIAN E		Control measures not properly operated or maintained	-	At the TA-03-38 Carpenter's Shop there is a significant amount of wood shavings that have accumulated around the wood bin on the south side.  Additionally, the wood covering for the bin needs to be properly secured.	d	EPC Walkdown	Clean up the wood shavings around the roll- off bin, properly secure the wooden cover to the top of the bin. Reported to the facility at the time of inspection. Reported to Roads and Grounds for clean up on 5/22/19. R&G did not respond to request for walk-down until 5/30/19. The work was completed on	N -		-	N	5/30/2019 9:30	5/30/2019 10:30 Y	-	-	-

CAR # FOD MSGP Facility Desc	Inspection Date Specific Location	Inspector Identifying CA Report Name Name Status		Finding Other Problem Description Desc	Inspection Type	Inspection Type Other	Corrective Action Description	SIO SIO Affect		Swppp Modify	CA Initiate Date CA	. Complete Date Comp	leted CA Expected	d Date CA Status Desc	EPA Notified Date
1670 UI TA-3-38 Metals Fab. Shop	12/17/2019 10:30 Control Measure number 0300103200017 (EnviroSoxx w/MetalLoxx) withing metal storage area at TA-3-38 MFS.	SHENDO SHENDO A new MARWIN MARWIN P corrective P action	Control measures not properly operated or maintained	- Within the metal storage area at the T 3-38 Metals Fabrication Shop, Contro Measure number 0300103200017 (EnviroSoxx with MetalLoxx wattle) was missing. Also, replace Control Measure number 0300103200018 (EnviroSoxx with MetalLoxx wattle). This type of wattle should be replaced quarterly.	ol .	1 -	Replace the missing EnviroSoxx with MetalLoxx wattle. Also, replace Control Measure number 0300103200018 (EnviroSoxx with MetalLoxx wattle). This type of wattle should be replaced quarterly and the last time it was replaced was 9/23/2019.	N -	-	Y	12/19/2019 13:45	12/20/2019 8:42 Y	-	N/A	
1668 UI TA-3-38 Metals Fab. Shop	12/17/2019 10:45 Sigma Mesa Storage Area for TA-3-38	SHENDO SHENDO A new MARWIN MARWIN P corrective P action	Control measures inadequate to meet non- numeric effluent limitations	<ul> <li>There were two storage racks at the Sigma Mesa Storage Area that contain piping for fabrication that were not covered. The piping belongs to the</li> </ul>	Routine facility inspection n	1 <del>-</del>	Cover the two metal storage racks containing piping.	N -	-	N		N	12/24/2019	9 17:00 N/A	-
1667 UI TA-3-38 Metals Fab. Shop	12/17/2019 10:15 In the metals storage area at T. 3-38 MFS.	A- SHENDO SHENDO A new MARWIN MARWIN P corrective P action	Control measures inadequate to meet non- numeric effluent limitations	Several pieces of metal need to be covered in the metal storage area at th TA-3-38 MFS.	Routine facility inspection ne	1 -	Cover the large piece of stainless steel pipe, two locations of extra thick ship building steel, and the dismanteled storage rack that was rusting.	N -	-	N	12/17/2019 12:30 1	2/17/2019 13:30 Y	-	N/A	-
1666 UI TA-3-38 Metals Fab. Shop	12/17/2019 10:30 NE corner of TA-3-38	SHENDO SHENDO A new MARWIN MARWIN P corrective P action	Control measures inadequate to meet non- numeric effluent limitations	At the NE corner of TA-3-38, metal roof drain and what appears to be a meter are stored outside. Appear to be abandoned.		l -	Salvage the metal roof drains and meter.	N -	-	N		N	12/24/2019	9 17:00 N/A	-
1665 UI TA-3-38 Metals Fab. Shop	12/17/2019 10:00 North of the Pipe Fitters Shop at TA-3-38	SHENDO SHENDO A new MARWIN MARWIN P corrective P action	Control measures inadequate to meet non- numeric effluent limitations	North of the Pipe Fitters Shop at TA- 38, there was a large piece of steel the had been cut on that was not covered. In addition, the ends of some pipe also was not covered.	at .	l -	Cover the large piece of steel and the ends of the piping or move the material inside the shop.	N -	-	N	12/17/2019 12:30 1	2/17/2019 13:30 Y	-	N/A	-
1653 UI TA-3-38 Metals Fab. Shop	11/20/2019 12:30 Metal Storage Yard and North Fence Line	BURGIN BURGIN A new JILLIAN E JILLIAN E corrective action	Control measures not properly operated or maintained	<ul> <li>At the TA-3-38 Metals Fab Shop, the is uncovered metal material (grating) the metal storage yard, and partially uncovered piping at the north fencelin (belong to the pipefitters).</li> </ul>	in	r =	Cover/recover metal materials and piping. The items were covered on 11/21/19.	N -	-	N	11/21/2019 8:00 1	1/21/2019 12:00 Y	-	N/A	-
1636 UI TA-3-38 Metals Fab. Shop	10/29/2019 17:24 Outfall 076 at the TA-3-38 Metals Fabrication Shop	WHEELER WHEELER A new HOLLY L HOLLY L corrective action	Average benchmark value exceedance	e - The average concentration of total Iro discharged from outfall 076 at the TA 3-38 Metals Fabrication Shop was mathematically certain to exceed the benchmark value. This average was calculated from monitoring results associated with storm events occurrin on 06/17/2019 and 08/06/2019 and individual analytical results of 3,340 ug/L and 1,390 ug/L. The average wa 1182.5 ug/L. The benchmark value is 1,000 ug/LXXX.	ig is	-	Personnel shall evaluate potential pollutant sources of total Iron and implement additional controls to ensure discharge of this pollutant source in stormwater is minimized. Corrective actions have been taken which post date this exceedance. The metal storage yard was swept in Aug 2019 and the Mettallox wattles were changed out in Sept 2019.	N -	-	Y	10/29/2019 17:24 1	0/29/2019 17:24 Y	-	N/A	-
1630 UI TA-3-38 Metals Fab. Shop	10/29/2019 12:00 Pipefitter's Storage Area at North Fenceline	BURGIN BURGIN A new JILLIAN E JILLIAN E corrective action	Control measures not properly operated or maintained	The tarp covering the large piping at the north fencline has come undone. Recover piping.	Routine facility inspection	· -	Recover piping at the north fenceline. 10/30/19 The shop reassessed the pipe for use and some of the piping was removed to be used for its intended project. The remaining pipe was recovered on 10/31/19 once a determination was made to keep it in place.	N -	-	N	10/30/2019 9:00	10/31/2019 9:00 Y		-	<u>,                                      </u>
1629 UI TA-3-38 Metals Fab. Shop	10/29/2019 12:00 Metal Fab Storage Yard	BURGIN BURGIN A new JILLIAN E JILLIAN E corrective action	Control measures not properly operated or maintained	- Metal materials need to be covered or re-covered in the metal storage yard. SE and NE locations of the metal storage yard.	r Routine facility inspection	1 -	Cover or re-cover metal materials in the storage yard. Completed 10/30/19.	N -	-	N	10/30/2019 8:00	10/30/2019 8:30 Y	-	-	-
1618 UI TA-3-38 Metals Fab. Shop	10/2/2019 16:59 Outfall 076 at the TA-3-38 Metals Fabrication Shop.	WHEELER WHEELER A new HOLLY L HOLLY L corrective action	Impaired water quality exceedance	Discharge from outfall 076 at the TA- 38 Metals Fabrication Shop exceeded the New Mexico water quality standar for total recoverable Aluminum. The concentration of total recoverable Aluminum discharged during the stor event on 06/17/2019 was 1,490 ug/L and the water quality standard is 1,01 ug/L.	l monitoring rd m	-	Personnel shall evaluate potential pollutant sources of total recoverable Aluminum and implement additional controls to ensure discharge of this pollutant source in stormwater is minimized. Corrective actions have been taken which post date this exceedance. The metal storage yard was swept in Aug 2019 and the Mettallox wattles were changed out in Sept 2019.		-	Y	10/3/2019 9:00	10/3/2019 9:00 Y	-	N/A	-
1613 UI TA-3-38 Metals Fab. Shop	9/25/2019 9:53 Parking Lot West of SM-38 Room 104	BURGIN BURGIN A new JILLIAN E JILLIAN E corrective action	Unauthorized release or discharge	West of the TA-3-38 Metals Fab Shoj a release from a plastic container (1 liter poly) occurred. Emergency Operations and HAZMAT responded A lid for the container was not visible in the area. HAZMAT characterized the material as wet soil and gravel. After wiping off the container a label was visible indicating the contents to la soil sample. It is unknown at this tin where the sample originated.	l.	Facility Reported	The contents were swept up and placed in a Ziploc for disposition by the WMC. Pursuant to 20.6.2.1203 the spill does not meet external reporting requirements.	N -	-	Y	9/25/2019 9:53	9/25/2019 12:00 Y	-	N/A	
1571 UI TA-3-38 Metals Fab. Shop	7/31/2019 14:00 West Side of Metal Storage Yard	BURGIN BURGIN A new JILLIAN E JILLIAN E corrective action	Control measures not properly operated or maintained	<ul> <li>At the TA-3-38 Metals Fab storage area, there is a bundle of rusted metal that is between the covered metal racks.</li> </ul>	Routine facility inspection	1 -	Cover the metal bundle or store under the covered metal racks.	N -	-	N	8/1/2019 9:00	8/1/2019 12:00 Y	-	N/A	-

CAR # FOD MSGP Facility Desc In	nspection Date Specific Location	Inspector Identifying CA Report Name Name Status	Finding Finding Ott Desc	ner Problem Description Inspection Type	Inspection Type Other	Corrective Action Description SIO SIC Aff	Provide Swppp ected Action Modify Taken at Affected SIOs	CA Initiate Date	CA Expected Date CA Status Desc	EPA Notified Date
1540 UI TA-3-38 Metals Fab. Shop	6/12/2019 11:13 Outfall 002 at the TA-3-38 Metals Fab Shop	WHEELER WHEELER A new HOLLY L HOLLY L corrective action	Average benchmark value - exceedance	The average concentration of total Iron discharged from outfall 002 at the TA-3-38 Metals Fab Shop was mathematically certain to exceed the benchmark value. This average was calculated from monitoring results associated with a storm event occurring on 04/22/2019 and individual analytical result of 7550 ug/L. The average was 7550 ug/L. The benchmark value is 1000 ug/L.	-	Personnel shall evaluate potential pollutant sources of total Iron and implement additional controls to ensure discharge of this pollutant source in stormwater is minimized. Personnel shall evaluate potential pollutant sources of dissolved Copper and implement additional controls to ensure discharge of this pollutant source in stormwater is minimized. 6/12/19 The DEP discussed the exceedance with EPC. The outfall storm drain sump had been cleaned out on 4/22/19, however there had been a large amount of sediment in the storm drain and there were multiple metal materials being moved at the facility during the time. It is theorized that these factors could have caused or contributed to the exceedance. The pipe rack on the north side of the facility was moved on 4/24/19 and the sampler was moved to a location northeast of the metal storage yard on 5/31/19.	- У	6/12/2019 16:00 6/12/2019 16:00 Y	- N/A	-
1539 UI TA-3-38 Metals Fab. Shop	6/12/2019 11:13 Outfall 002 at the TA-3-38 Metals Fab Shop	WHEELER WHEELER A new HOLLY L HOLLY L corrective action	Impaired water quality - exceedance	Discharge from outfall 002 at the TA-3- Impaired waters 38 Metals Fab Shop exceeded the New monitoring Mexico water quality standard for dissolved Copper. The concentration of dissolved Copper discharged during the storm event on 04/22/2019 was 24.9 ug/L and the water quality standard is 7 ug/L.		Personnel shall evaluate potential pollutant sources N of dissolved Copper and implement additional controls to ensure discharge of this pollutant source in stormwater is minimized. 6/12/19 The DEP discussed the exceedance with EPC. The outfall storm drain sump had been cleaned out on 4/22/19, however there had been a large amount of sediment in the storm drain and there were multiple metal materials being moved at the facility during the time. It is theorized that these factors could have caused or contributed to the exceedance. The pipe rack on the north side of the facility was moved on 4/24/19 and the sampler was moved to a location northeast of the metal storage yard on 5/31/19.	- Y	6/12/2019 16:00 6/12/2019 16:00 Y	- N/A	-
1531 UI TA-3-38 Metals Fab. Shop	5/22/2019 10:30 Northeast Corner of Metal Storage Yard (Interior)	BURGIN BURGIN A new JILLIAN E JILLIAN E corrective action	Control measures not - properly operated or maintained	At the TA-03-38 Metals Fab Shop, a Other (describe): metallox wattle needs to be installed at the NE corner of the metal storage yard, as previously requested by EPC (for the new berming/BMP configuration). There is a wattle on site but it is currently not being used in the proper position.	EPC Walkdown	Reposition the wattle on site so that it will filter N - runoff at the NE corner of the metal storage yard. The work needed was reported to Roads and Grounds on 5/22/19. R&G did not respond to request for walk-down until 5/30/19. The work was completed on 5/30/19.	. Y	5/30/2019 10:30 5/30/2019 11:00 Y		-
1530 UI TA-3-38 Metals Fab. Shop	5/22/2019 10:30 NE Side of Metal Storage Ar	rea BURGIN BURGIN A new JILLIAN E JILLIAN E corrective action	Control measures - inadequate to meet non- numeric effluent limitations	At the TA-03-38 Metals Fab Shop Other (describe): debris and materials (excess concrete and asphalt from recent berm installation) need to be cleaned up from the area around the metal storage yard.	EPC Walkdown	Sweep/clean-up the applicable areas. Reported N - work needed to Roads & Grounds on 5/22/19.  R&G did not respond to request for walk-down until 5/30/19. The work was completed on 5/30/19.	- N	5/30/2019 10:00 5/30/2019 10:30 Y		-
1529 UI TA-3-38 Metals Fab. Shop	5/22/2019 10:30 Run-on Berm Northwest Sidor Facility and NW Parking I	e BURGIN BURGIN A new ot JILLIAN E JILLIAN E corrective action	Control measures not - properly operated or maintained	At the TA-03-38 Metals Fab Shop the Other (describe): run-on berm has been damaged at the NW corner due to recent fencing removal for parking lot installation.  Additionally, there are metal pieces and debris in the parking lot that need to be cleaned up.	EPC Walkdown	The run-on berm needs to be repaired. The debris in the parking lot needs to be cleaned up. Reported to Roads & Grounds at the time of inspection. R&G did not respond to request for walkdown until 5/30/19. R&G stated that parking lot was still under construction and they were hesitant to perform work at the time. The DEP then contacted the paving supervisor to walk-down the corrective actions. The R&G paving supervisor did not respond for walkdown until 6/4/19. DEP walked down the parking lot with the R&G paving supervisor on 6/4/19. The run-on berm will be (was) repaired with gravel bags on 6/4/19; since there are plans to remove the asphalt millings berm and install a retaining wall around the lot in the near future. The parking lot is scheduled to be completely swept over the weekend when the area is free of vehicles.	- N	5/30/2019 9:00 6/8/2019 12:00 Y	The parking lot needs to blocked off/free of vehic order for it to be adequate swept. In order to not inconvenience employee work is scheduled to be performed over the week 6/8/19.	les in tely s, this

CAR#	FOD M	1SGP Facility Desc	Inspection Date	Specific Location	Inspector Name	Identifying CA R Name Status			inding Other Desc	Problem Description	Inspection Type	Inspection Type Other	Corrective Action Description	SIO SIO Affecto		Swppp CA Modify	Initiate Date	CA Complete Date Completed	CA Expected Date	e CA Status Desc	EPA Notified Date
1500	OUI TA	A-3-38 Metals Fab. Shop	9 4/23/2019 9:	27 Outfall 002 at TA-3-38.		R SHENDO A new MARWIN P correc action	tive discharge	ized release or -		At outfall 002 at the TA-3-38 Metals Fabrication Shop, there was a sheen in the sample collected for visual assessment on 4/23/2019 at 9:27 am.		Visual Assessment	Immediate action shall be taken to identify the source of the oil sheen at the outfall and clean it up.	N -	-	N	4/24/2019 8:30	4/24/2019 9:30 Y	-	The DEP received notice of th CAR on 4/24/19 and immediately inspected the area around the storm drain (outfal There was no definitive sign o an oil leak or spill but a couple suspect spots located south of the storm drain. The area was treated with Microblaze as we as the drainage area to the nor of storm drain and directly around the storm drain. The DEP will inspect the area again when the storm water has evaporated in a day or so.	ea ill), of lee f s ell rth
1470	UI TA	A-3-38 Metals Fab. Shop	3/6/2019 13:	30 East of Metal Storage Yard		BURGIN A new JILLIAN E correc action	tive properly	neasures not - operated or d		The asphalt berm that was installed eas of the metal storage yard was breached during snow events/snow removal over the winter.		DEP Observation	The berm needs repair and possibly relocated to avoid future damage; or may need to be replaced with alternative BMPs.	N -	-	Y	3/8/2019 9:00	3/11/2019 14:00 Y	·	Roads and grounds will install gravel bags on 3/8/19. A walkdown will be scheduled to determine the future need of berm and/or alternative BMPs Gravel bags were added to the damaged area of the berm on 3/8/19 and a cold patch was placed in the center on 3/1/19	s. e

#### ATTACHMENT 10: SCHEDULED MAINTENANCE LOG

**Control Measure or** 

	Control Measure of	<u> </u>					
	<b>Equipment Description</b>	Action Taken By					
Date	(include location where appropriate)	Action Taken/Comments	(printed name & Z no.)				
	(		(рее лет.				
	1	II.	I.				

ATTACHMENT 11: TRAINING DOCUMENTATION

### 2018 SWPPP Training Roster – TA-03-38 Carpenter's Shop 12/13/2018

Name	Z#	Job Title
Lonnie Tamet	176542	Craft Sprintenent Curpenter GF
John Madon	177949	Curpenter GF
		/
,		
		,

#### 2018 Annual SWPPP Training

#### **TA-3-38 Carpenter's Shop**

- Review 2017 training presentation (new employees to the SWPPP, if applicable)
- New BMPs:
  - Covered storage bin for the metal posts at the SW section of the yard. It's cute!
- Review of Corrective Actions for the year:
  - ↓ 1/31/18: Tarp was totally torn off of the stack of metal posts at the southwest corner of the storage yard. CAR reported at time of inspection. The posts were recovered on 2/1/18.
  - ♣ 4/26/18: Metal posts are uncovered at SW corner of yard and a bundle of rebar is on the ground. Reported to facility personnel the same day of inspection. The shop is planning to make a covered storage container for the posts. The posts were re-tarped in the meantime - 5/15/18.

#### Water Quality Exceedances:

- ♣ 8/30/18: Discharge from outfall 073 at the TA-3-38 Carpenter Shop exceeded the New Mexico water quality standard for dissolved Copper. The concentration of dissolved Copper discharged during the storm event on 7/17/2018 was 17.1 ug/L and the water quality standard is 6 ug/L. Personnel shall evaluate potential pollutant sources of dissolved Copper and implement additional controls to ensure discharge of this pollutant source in stormwater is minimized. Facility personnel must immediately take action to minimize off site discharge of dissolved Copper at outfall 073. \*Sweeping of the west lot at SM-38 Carpenter's Shop was performed on 7/30/18 which post-dates this exceedance.
- ↓ 10/02/18: Discharge from outfall 073 at the TA-3-38 Carpenter Shop exceeded the New Mexico water quality standard for total recoverable Aluminum. The concentration of total recoverable Aluminum discharged during the storm event on 8/16/2018 was 1090 ug/L and the water quality standard is 681 ug/L. Personnel shall evaluate potential pollutant sources of total recoverable Aluminum and implement additional controls to ensure discharge of this pollutant source in stormwater is minimized. Evaluated site on 10/3/18 and requested Metallox Wattle be changed out and area swept around wood shavings bin. Work was completed by Roads & Grounds on 10/12/18.
- Review of Spills:
  - ♣ There were no spills or releases for the year. Yay! ☺
- SWPPP updates for 2019:
  - ♣ No major changes. Due ~2/1/19. LANS, LLC to Triad.
- General Discussion/Issues:



# Storm Water Multi-Sector General Permit (MSGP) for Industrial Facilities

TA-3-38 Carpenter Shop (CS)

2017-2018 SWPPP Training

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- The MSGP is a National Pollutant Discharge Elimination System (NPDES) Permit associated with the Clean Water Act (CWA) of 1973
  - Regulates storm water discharges from industrial facilities/activities
  - Objective is to minimize pollutants to surface waters
  - Requires implementation of a Stormwater Pollution Prevention Plan (SWPPP)
  - A new permit (with no.) is issued approx. every 5 years
    - 2015 MSGP #NMR053915 (LANS)
    - Link to 2015 MSGP: <a href="https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015">https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015</a> finalpermit.pdf







## LANL MSGP Regulated Facilities:

- Metals Fab Shop TA-03-38: Sector AA (Fabricated Metal Products)
- Carpenter Shop TA-03-38: Sector A (Timber Products)
- Asphalt Batch Plant TA-60-233: Sector D (Asphalt Paving)
- Metal Recycling Facility (MRF) TA-60-311: Sector N (Scrap Recycling)
- Roads & Grounds TA-60-250: Sector P (Land Transportation/Warehousing)
- Power Plant TA-03-1790: Sector O (Steam Electric Generating)
- Heavy Equipment TA-60-01: Sector P (Land Transportation/Warehousing)
- Salvage Yard TA-60-02: Sector P (Land Transportation/Warehousing)
- TA-3-39 & 102 Sector AA (Fabricated Metal Products)
- Sigma Complex Foundry TA-03-66: Sector AA & F (Fabricated & Primary Metals)
- TA-54 TA-54-Area G, Area L & Rant: Sector K (Hazardous Waste TSDF)
- Maint. Facility West TA-54-Area L: Sector P (Land Transportation/Warehousing)





## TA-3-38 CS SWPPP - Team Members

- TA-3-38 Carpenter Shop SWPPP Team:
  - Donnie Parrett, Shop Superintendent, LOG-Central Shops
  - Jillian Burgin, Deployed Environmental Professional (DEP)
  - Russell Stone, ESH Manager DSESH-UIS
  - Holly Wheeler, MSGP Compliance Lead, EPC-CP
  - See Facility Managers
- Facility Managers/FOD
  - Jim Farmer, Maintenance Manager, LOG-MSS
  - John Merhege, Logistics Division Leader
  - Andrew Erickson, UI FOD





# TA-3-38 CS SWPPP —Control Measures (BMPs)

 Run-On Control: The south and west boundary of the site is stabilized with rock and paving to provide run-on control from the west parking lot.











# TA-3-38 CS SWPPP – Control Measures (BMPs)

 <u>Covered Metal/Material Storage</u>: Covered storage racks, rolloff bins, enclosed storage sheds, and flam cabinets minimize storm water contact with materials and pollutants.









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# TA-3-38 CS SWPPP - Control Measures (BMPs)



- Good House-Keeping Practices: Covered and enclosed trash bins minimize debris on site. Monthly sweeping of the west lot removes accumulated dust and reduces pollutants.
- YOU can help reduce trash as well: keep truck beds clean, properly dispose of food trash and cigarette butts, keep dumpsters closed. Recycle water bottles, cans, plastic bags, etc..











# TA-3-38 CS SWPPP - Spill Reporting



Know where spill kits are located.

Report spills immediately to your supervisor.

Additional contacts are provided in the LOG-MSS Guidance:





Los Alamos National Laboratory - LOG-MSS Guidance

Do you know who to call in the event of a spill/leak?





SEO (EM&R):

EPC-CP: 667-0666

or Spill Pager

664-7722

Roads & Grounds:

667-6111

WMCs Spill Pager:

<u>664-5864</u>

LOG-MSS DEP:

<u>665-1893</u>



**Spills** and leaks from vehicles, equipment and laboratory operations can accidentally occur. Oil, fuel, hydraulic fluids and other chemicals, once spilled or leaked to the environment are pollutants that require immediate clean-up and spill reporting. It is important to prevent pollutants from entering into a watercourse or storm drain and from coming into contact with storm water. If you have the ability and materials to contain a spill (i.e. spill kit—absorbent pads, booms, etc.) you may do so in order to prevent migration of the spilled material until additional help arrives. You are still required to report the spill and should be aware of who to contact.

The appropriate spill contact should be listed in your Integrated Work Document (IWD). This can vary from your PIC to the Security & Emergency Operations Center (SEO), also known as EM&R, to your site access control office. The name and contact information for your Waste Management Coordinator (WMC) should also be listed in the IWD.

When in doubt, contact the SEO. They will respond, assess the situation, determine further actions required and will contact appropriate personnel. The Environmental Protection & Compliance (EPC-CP) group will also be contacted. EPC-CP will ensure a Spill Report is completed to document the spill. If the pollutant has reached a watercourse or storm drain, EPC-CP is responsible for reporting the spill to the state environment department - NMED and EPA.

A WMC will ensure that waste from a spill clean-up is properly managed and disposed. The LOG-MSS or FOD Deployed Environmental Professional (DEP) can help coordinate spill response and clean-up activities and can complete the Spill Report form.

-Jillian Burgin, Deployed Environmental Professional for LOG-MSS

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# TA-3-38 CS SWPPP - Sampler & Outfalls



# Sampler(s)

- Automated collection during storm events
- Monitoring for pollutants
  - Benchmark (sector specific limits)
  - Impaired Waters (receiving water)
    - Sandia Canyon

# Storm Drains (Outfalls)

- Sample/discharge points (automated & visual)
- Evaluated during inspections
- Each numbered for site map
- 2 Outfalls on site, Outfalls 073 & 074
- 1 Monitored: Outfall 073

















- There are two types of monitoring:
  - Benchmark (Quarterly)
    - Monitors for sectorspecific pollutants (i.e. metals)
  - Impaired Waters (Annual)
    - Monitors for pollutants associated with receiving water limits or impairments.

## Sampling parameters for TA-3-38 CS

-				
Monitoring Type	Location	Parameters	Numeric Limitations	Schedule
Benchmark  Subsector A Timber Products Subsector A4 Wood Products not elsewhere classified (SIC 2449)	Sampler: MSGP07302 Outfall #073 Sandia Canyon	Chemical Oxygen Demand (COD)  Total Suspended Solids (TSS)	120 mg/L 100 mg/L	Quarterly
Impaired Waters	Sampler: MSGP07302 Outfall #073 Sandia Canyon	Aluminum  Gross Alpha, adjusted  Copper  Thallium, dissolved PCB in Water Column	681 ug/L 15 pCi/L 6 ug/L 0.47 ug/L 0.00064 ug/L	Annual

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## Monthly Routine Inspections

- Performed by DEP and facility rep, annual with EPC-CP
  - Check for non-compliance issues/identify corrective actions
    - (i.e. housekeeping, uncovered materials, spills/pollutant discharge, BMP integrity)

## Quarterly Visual Inspections

- Performed during a storm event each quarter at each outfall (if possible)
  - Storm water sample collected in a clean, clear glass
  - Storm water sample evaluated for potential pollutants
    - (i.e. odor, oil sheen, suspended particles)
  - Additional BMPs may be required if pollutants are evident

## Additional Reporting Requirements

- Annual reporting to EPA for corrective action status
- Quarterly Discharge Monitoring Report (DMR) for sample results
- Spill reporting to EPC-CP and potentially NMED if reportable



## **TA-3-38 CS SWPPP - Corrective Actions**



## MSGP Corrective Action Process

- Once identified immediate reporting to appropriate facility personnel
- Entered into CARs database/main-con. for EPC-CP reporting/tracking
- Specific deadlines for completion:
  - Same day or next day if identified late in the day or after regular business hours (quick fixes)
  - 14 days (order parts, schedule labor) >must provide schedule to EPC-CP
  - 45 days maximum (temporary BMPs required in the meantime)
  - >45 days: Report to EPC-CP for EPA is required (schedule must be provided for completion). EPA <u>must</u> approve schedule.
- FSRs with cost codes may be required
- Anyone can report not just inspector or EPC-CP
- Exceedances from sampling can trigger corrective actions, applicable to the same deadlines as noted above.



## TA-3-38 CS SWPPP – Documentation



- Required Documentation for SWPP Plan
  - Site Maps
    - Facility Specific
    - Receiving Waters
    - Endangered Species
  - Completed Inspection Forms & Templates
  - Annual Reporting Data
  - Notice of Intent (NOI) to EPA
  - Non-Storm Water Discharge Certification
  - Spill Tracking Table
  - Amendment Log
  - Sampling Results
  - Training Records
  - Critical Habitat Documentation/Historic Properties/NEPA
  - Procedures Referenced in the SWPPP



## TA-3-38 CS SWPPP – Location & Contacts



- A hard copy of the SWPP Plan is kept in DEP office and/or at facility.
- The SWPP Plan is updated annually and can be found online on the public reading room at:
  - http://permalink.lanl.gov/object/tr?what=info:lanl-repo/lareport/LA-UR-17-20933

## Environmental Contacts:

- > Jillian Burgin, DESHS-UIS, DEP: 665-1893
- Leonard Sandova, DESHS-UIS, DEP: 231-1235
- Russell Stone, DESHS-UIS, ESH Mgr.: 606-0017
  - Holly Wheeler, EPC-CP: 667-1312



## 2018 SWPPP Training Roster – TA-03-38 Metals Fabrication Shop 12/17/18

Name	Z#	Job Title
Thomas P. Chanez	122037	shop Superintendent
John W Reed	148050	shop Superindendend SHEET MET AL Shop FOREMAN
1 sur Weredith	101794	I KONWORKERS FORE MAN
Myan Drenner	253383	Shop Superintentent
		/

#### 2018 Annual SWPPP Training

#### **TA-3-38 Metals Fabrication Shop**

- Review 2017 training presentation (new employees to the SWPPP, if applicable)
- New BMPs:
  - ♣ Berm at metal storage yard
- Review of Corrective Actions for the year:
  - ↓ 1/31/18: A pile of gravel (from a torn gravel bag) is directly east of the trench drain (at lower Pipefitter's shop). Clean up the gravel so it does not go into the trench drain. CAR reported to Pipefitter Foreman at the time of inspection. CA was completed 2/1/18.
  - 4/26/18: Metal piping is on the ground in front of the pipefitter's rack. Properly store piping on rack. Reported to pipefitter's and fire protection supervisors the same day of inspection.
  - ♣ 4/26/18: Trash is around dumpster and north fenceline around pipe rack. Clean up trash
    in areas listed above. Reported to Roads & Grounds the day of inspection. They are
    scheduled to clean up trash on 4/27.
  - ♣ 5/31/18: The MetalLoxx wattle [BMP #0300103200005] at the NE corner of the metal storage yard needs to be replaced. Roads & grounds will need to replace wattle. Wattle replaced morning of 6/11/18.

#### • Water Quality Exceedances:

- \*\* 8/30/18: The average concentration of dissolved Zinc discharged from outfall 002 at the TA-3-38 Metals Fabrication Shop was mathematically certain to exceed the benchmark value. This average was calculated from monitoring results associated with storm events occurring on 10/04/2017, 10/05/2017 and 7/05/2018 and individual analytical results of 137 ug/L, 93.8 ug/L and 285 ug/L. The average was 128.95 ug/L. The benchmark value is 76 ug/L. Personnel shall evaluate potential pollutant sources of dissolved Zinc and implement additional controls to ensure discharge of this pollutant source in stormwater is minimized. Facility personnel must immediately take action to minimize off site discharge of dissolved Zinc at outfall 002. \*Sweeping of the west lot at SM-38 Metals Fab was performed on 7/30/18 which post-dates this exceedance.
- ♣ 8/30/18: Discharge from outfall 002 at the TA-3-38 Metals Fabrication Shop exceeded the New Mexico water quality standard for total recoverable Aluminum. The concentration of total recoverable Aluminum discharged during the storm event on 7/05/2018 was 1,550 ug/L and the water quality standard is 681 ug/L. Personnel shall evaluate potential pollutant sources of total recoverable Aluminum and implement additional controls to ensure discharge of this pollutant source in stormwater is minimized. Facility personnel must immediately take action to minimize off site discharge of total recoverable Aluminum at outfall 002. \*Sweeping of the west lot at SM-38 Metals Fab was performed on 7/30/18 which post-dates this exceedance.
- **♣** 8/30/18: Discharge from outfall 002 at the TA-3-38 Metals Fabrication Shop exceeded the New Mexico water quality standard for dissolved Copper. The concentration of

dissolved Copper discharged during the storm event on 7/05/2018 was 40 ug/L and the water quality standard is 6 ug/L. Personnel shall evaluate potential pollutant sources of dissolved Copper and implement additional controls to ensure discharge of this pollutant source in stormwater is minimized. Facility personnel must immediately take action to minimize off site discharge of dissolved Copper at outfall 002. \*Sweeping of the west lot at SM-38 Metals Fab was performed on 7/30/18 which post-dates this exceedance.

- Review of Spills:
  - There were no spills this year!
- SWPPP updates for 2019:
- General Discussion/Issues:
  - → Most CARs are not related to the MFS. This is why the berm was installed. We are hoping that sampling can be performed at the metal storage yard and the rest of the facility can be removed from the SWPPP.
  - ♣ The Outfall 002 storm drain and Metallox wattle are on a PM for cleanout/replacement. April, July & October.
  - ♣ Clean-up on the west side of SM-38 has been noticed.



# Storm Water Multi-Sector General Permit (MSGP) for Industrial Facilities

TA-3-38 Metals Fabrication Shop

2017-2018 SWPPP Training

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- The MSGP is a National Pollutant Discharge Elimination System (NPDES) Permit associated with the Clean Water Act (CWA) of 1973
  - Regulates storm water discharges from industrial facilities/activities
  - Objective is to minimize pollutants to surface waters
  - A new permit (with no.) is issued approx. every 5 years 2016
     MSGP #NMR053915 (LANS)
  - Requires implementation of a Stormwater Pollution Prevention Plan (SWPPP)



## TA-3-38 MFS SWPPP – LANL Facilities



- LANL MSGP Regulated Facilities:
  - Metals Fab Shop TA-03-38: Sector AA (Fabricated Metal Products)
  - Carpenter Shop TA-03-38: Sector A (Timber Products)
  - Asphalt Batch Plant TA-60-233: Sector D (Asphalt Paving)
  - Metal Recycling Facility (MRF) TA-60-311: Sector N (Scrap Recycling)
  - Roads & Grounds TA-60-250: Sector P (Land Transportation/Warehousing)
  - Power Plant TA-03-1790: Sector O (Steam Electric Generating)
  - Heavy Equipment TA-60-01: Sector P (Land Transportation/Warehousing)
  - Salvage Yard TA-60-02: Sector P (Land Transportation/Warehousing)
  - TA-3-39 & 102 Sector AA (Fabricated Metal Products)
  - Sigma Complex Foundry TA-03-66: Sector AA & F (Fabricated & Primary Metals)
  - TA-54 TA-54-Area G, Area L & Rant: Sector K (Hazardous Waste TSDF)
  - Maint. Facility West TA-54-Area L: Sector P (Land Transportation/Warehousing)







- TA-3-38 Metals Fabrication Shop SWPPP Team:
  - Thomas Chavez, Shop Superintendent, LOG-MSS
  - Jillian Burgin, Deployed Environmental Professional (DEP)
  - Russell Stone, ESH Manager DSESH-UIS
  - Holly Wheeler, MSGP Compliance Lead, EPC-CP
- Facility Managers/FOD
  - Jim Farmer, Maintenance Manager, LOG-MSS
  - John Merhege, Logistics Division Leader
  - Andrew Erickson, UI FOD



# TA-3-38 MFS SWPPP – Site Specific Control Measures (BMPs)



 Asphalt Berming: West & NW boundaries of the facility: Reduces storm water run-on to the site from roadways and parking areas.







# TA-3-38 MFS SWPPP – Site Specific Control Measures (BMPs)



 <u>Covered Metal/Material Storage</u>: Covered storage racks and roll-off bins minimize storm water contact with materials and pollutants.









# TA-3-38 MFS SWPPP - Control Measures (BMPs)



Good House-Keeping Practices: Covered and enclosed trash bins minimize debris on site. Monthly sweeping of the west lot removes accumulated dust and reduces pollutants. <u>YOU</u> can help reduce trash as well: keep truck beds clean, properly dispose of food trash and cigarette butts, keep dumpsters closed. Recycle water bottles, cans, plastic bags, etc..







# TA-3-38 MFS SWPPP - Control Measures (BMPs)



Petro Pipe Oil Barrier: The Petro Pipe Oil Barrier is used at the end point of the drainage pipe for the trench drain sump (located west of the pipefitter's shop). This allows excess storm water discharge from the trench drain while filtering out oil sheen that accumulates from the parking lot run-off.



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## TA-3-38 MFS SWPPP -Spill Reporting



Spill Kits for the TA-3-38 MFS are located in Rm 125 and in metal containers throughout the shop.

Report spills immediately to your supervisor. Additional contacts are provided in the LOG-MSS Guidance



Los Alamos National Laboratory - LOG-MSS Guidance

Do you know who to call in the event of a spill/leak?







WMCs Spill Pager: 664-5864

667-6111

LOG-MSS DEP:

665-1893



Spills and leaks from vehicles, equipment and laboratory operations can accidentally occur. Oil, fuel, hydraulic fluids and other chemicals, once spilled or leaked to the environment are pollutants that require immediate clean-up and spill reporting. It is important to prevent pollutants from entering into a watercourse or storm drain and from coming into contact with storm water. If you have the ability and materials to contain a spill (i.e. spill kit—absorbent pads, booms, etc.) you may do so in order to prevent migration of the spilled material until additional help arrives. You are still required to report the spill and should be aware of who to contact.

The appropriate spill contact should be listed in your Integrated Work Document (IWD). This can vary from your PIC to the Security & Emergency Operations Center (SEO), also known as EM&R, to your site access control office. The name and contact information for your Waste Management Coordinator (WMC) should also be listed in the IWD.

When in doubt, contact the SEO. They will respond, assess the situation, determine further actions required and will contact appropriate personnel. The Environmental Protection & Compliance (EPC-CP) group will also be contacted. EPC-CP will ensure a Spill Report is completed to document the spill. If the pollutant has reached a watercourse or storm drain, EPC-CP is responsible for reporting the spill to the state environment department -NMED and EPA.

A WMC will ensure that waste from a spill clean-up is properly managed and disposed. The LOG-MSS or FOD Deployed Environmental Professional (DEP) can help coordinate spill response and clean-up activities and can complete the Spill Report form.

-Jillian Burain, Deployed Environmental Professional for LOG-MSS

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## TA-3-38 MFS SWPPP - Sampler & Outfalls Los A



## Sampler(s)

- Automated collection during storm events
- Monitoring for pollutants
  - Benchmark (sector specific limits)
  - Impaired Waters (receiving water)
    - Sandia Canyon

## Storm Drains (Outfalls)

- Sample/discharge points (automated & visual)
- Evaluated during inspections
- Each numbered for site map
- 1 Monitored outfall on site: Outfall 002



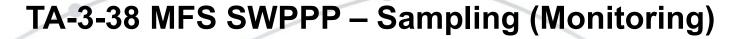














- There are two types of monitoring:
  - Benchmark (Quarterly)
    - Monitors for sectorspecific pollutants (i.e. metals)
  - Impaired Waters (Annual)
    - Monitors for pollutants associated with receiving water limits or impairments.

## Sampling parameters for TA-3-38 MFS

Monitoring Type	Location	Parameters		Numeric Limitations	Schedule
Benchmark	Sampler: MSGP02001 Outfall #002	Total Aluminum*	0.681 mg/L	None *Hardness	Quarterly
Subsector AA1. Fabricated	AA1. Canyon  abricated  Metal roducts, except Coating SIC 3411- 99; 3911-	Total Iron	1.0 mg/L	Dependent 57 (60) mg/L	
Products,		Total Zinc1*	0.076 mg/L		
Coating (SIC 3411- 3499; 3911- 3915)		Nitrate plus Nitrite Nitrogen	0.68 mg/L		
Impaired Waters	Sampler: MSGP02001 Outfall #002 Sandia	Aluminum Gross Alpha, adjusted	0.681 mg/L 15 pCi/L	None	Annual
	Canyon	Copper Thallium, dissolved	0.006 mg/L 0.47 ug/L		
		PCB in Water Column	0.00064 ug/L		

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## **TA-3-38 MFS SWPPP - Inspections**



## Monthly Routine Inspections

- Performed by DEP, annual with EPC-CP
  - Check for non-compliance issues/identify corrective actions
    - (i.e. housekeeping, uncovered materials, spills/pollutant discharge, BMP integrity)

## Quarterly Visual Inspections

- Performed during a storm event each quarter at each outfall (if possible)
  - Storm water sample collected in a clean, clear glass
  - Storm water sample evaluated for potential pollutants
    - (i.e. odor, oil sheen, suspended particles)
  - Additional BMPs may be required if pollutants are evident

## Additional Reporting Requirements

- Annual reporting to EPA for corrective action status
- Quarterly Discharge Monitoring Report (DMR) for sample results
- Spill reporting to EPC-CP and potentially NMED if reportable



## **TA-3-38 MFS SWPPP - Corrective Actions**



## MSGP Corrective Action Process

- Once identified immediate reporting to appropriate facility personnel
- Entered into CARs database/main-con. for EPC-CP reporting/tracking
- Specific deadlines for completion:
  - Same day or next day if identified late in the day or after regular business hours (quick fixes)
  - 14 days (order parts, schedule labor) >must provide schedule to EPC-CP
  - 45 days maximum (temporary BMPs required in the meantime)
  - >45 days: Report to EPC-CP for EPA is required (schedule must be provided for completion). EPA <u>must</u> approve schedule.
- FSRs with cost codes may be required
- Anyone can report not just inspector or EPC-CP
- Exceedances from sampling can trigger corrective actions, applicable to the same deadlines as noted above.



## **TA-3-38 MFS SWPPP – Documentation**



- Required Documentation for SWPP Plan
  - Site Maps
    - Facility Specific
    - Receiving Waters
    - Endangered Species
  - Completed Inspection Forms & Templates
  - Annual Reporting Data
  - Notice of Intent (NOI) to EPA
  - Non-Storm Water Discharge Certification
  - Spill Tracking Table
  - Amendment Log
  - Sampling Results
  - Training Records
  - Critical Habitat Documentation/Historic Properties/NEPA
  - Procedures Referenced in the SWPPP



## TA-3-38 MFS SWPPP



- The SWPP Plan is updated annually and can be found online on the public reading room at:
  - http://permalink.lanl.gov/object/tr?what=info:lanl-repo/lareport/LA-UR-16-20816

## Environmental Contacts:

- Jillian Burgin, DESHS-UIS, DEP: 665-1893
- Russell Stone, DESHS-UIS, ESH Mgr.: 606-0017
  - > Holly Wheeler, EPC-CP: 667-1312



#### TA-03-38 Carpentry and Metal Fabrication Shops MSGP Stormwater Pollution Prevention Plan Revision 1, January 2020

ATTACHMENT 12: MSGP (OR ACTIVE URL)

A copy of the 2015 MSGP is kept on file with the SWPPP hard copy.

The active URL for the permit is: <a href="https://www.epa.gov/npdes/final-2015-msgp-documents">https://www.epa.gov/npdes/final-2015-msgp-documents</a>

## ATTACHMENT 13: THREATENED AND ENDANGERED SPECIES HABITAT MANAGEMENT PLAN FOR LOS ALAMOS NATIONAL LABORATORY

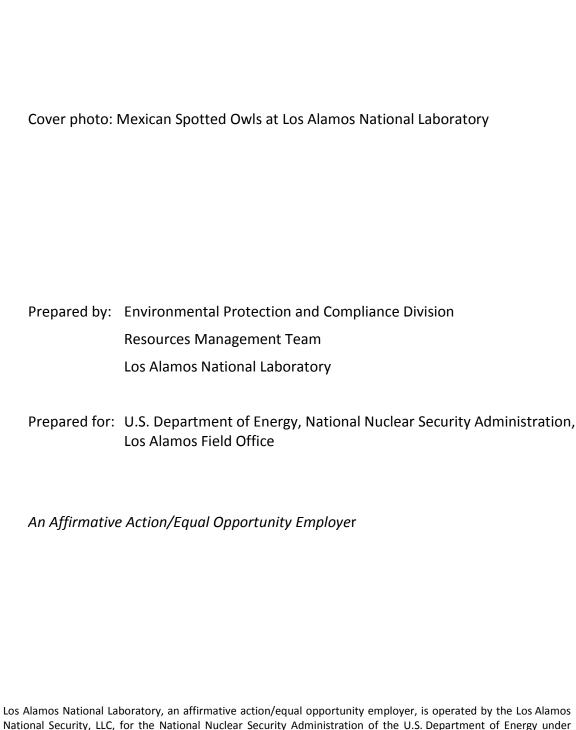
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October2017

# Threatened and Endangered Species Habitat Management Plan for Los Alamos National Laboratory







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## Threatened and Endangered Species Habitat Management Plan

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### **ACRONYMS AND TERMS**

AEI area of environmental interest

Bd Batrachochytrium dendrobatidis (Chytrid Fungus)

DARHT Dual-Axis Radiographic Hydrodynamic Test (Facility)

dB decibel

dB(A) A-weighted decibel

dB(C) C-weighted decibel

DDT (dichloro-diphenyl-trichloroethane)

DOE U.S. Department of Energy

ESA Endangered Species Act of 1973

fc foot candles

Field Office U.S. Department of Energy Los Alamos Field Office

FR Federal Register

GIS geographic information system

HMP Threatened and Endangered Species Habitat Management Plan

HVAC heating, ventilation, and air conditioning

LANL Los Alamos National Laboratory

LANS Los Alamos National Security, LLC

NEPA National Environmental Policy Act of 1969

PCBs polychlorinated biphenyls

TNT trinitrotoluene(2,4,6-)

USFWS U.S. Fish and Wildlife Service

## I. THREATENED AND ENDANGERED SPECIES HABITAT MANAGEMENT PLAN GENERAL OVERVIEW

#### 1.0 Introduction

Los Alamos National Laboratory's (LANL) Threatened and Endangered Species Habitat Management Plan (HMP) fulfills a commitment made to the U.S. Department of Energy (DOE) in the "Final Environmental Impact Statement for the Dual-Axis Radiographic Hydrodynamic Test Facility Mitigation Action Plan" (DOE 1996). The HMP received concurrence from the U.S. Fish and Wildlife Service (USFWS) in 1999 (USFWS consultation numbers 2-22-98-I-336 and 2-22-95-I-108). This 2017 update retains the management guidelines from the 1999 HMP for listed species, and updates some descriptive information.

#### 2.0 Role of Site Plans in the HMP

The purpose of the HMP is to provide a management strategy for Endangered Species Act (ESA) compliance through the protection of threatened and endangered species and their habitats on LANL property. The HMP consists of site plans for federally listed threatened or endangered species with a moderate or high probability of occurring at LANL. The following federally listed threatened or endangered species currently have site plans at LANL: Mexican Spotted Owl (*Strix occidentalis lucida*), Southwestern Willow Flycatcher (*Empidonax trailii extimus*), and Jemez Mountains Salamander (*Plethodon neomexicanus*). Site plans provide guidance to ensure that LANL operations do not adversely affect threatened or endangered species or their habitats.

The Black-footed Ferret (*Mustela nigripes*) is federally listed as endangered. However, no sightings of Black-footed Ferrets have been reported in Los Alamos County for more than 50 years. In addition, no large prairie dog towns, prime habitat for Black-footed Ferrets, have been observed at LANL. Therefore, there is no site plan for this species.

The New Mexico Meadow Jumping Mouse (*Zapus hudsonius luteus*) and Yellow-billed Cuckoo (*Coccyzus americanus*) do not require a site plan because they do not have breeding habitat on LANL property. In Keller (2015), it was concluded that if any LANL work activities might affect habitat for these two species, those activities would be reviewed for impacts.

## 3.0 Description of Areas of Environmental Interest

Suitable habitats for federally listed threatened and endangered species have been designated as areas of environmental interest (AEIs). AEIs are geographical units at LANL that are managed for the protection of federally listed species and consist of core habitat areas and buffer areas. The purpose of the core habitat is to protect areas essential for the existence of the specific threatened or endangered species. This includes the appropriate habitat type for breeding, prey availability, and micro-climate conditions. The purpose of buffer areas is to protect core areas from undue disturbance and habitat degradation.

Site plans identify restrictions on activities within the AEIs. The USFWS reviewed allowable activities and provided concurrence that these activities are not likely to adversely affect federally listed species. Activities discussed in site plans include day-to-day activities causing

disturbance (hereafter referred to as "disturbance activities"), such as access into an AEI, and long-term impacts, such as habitat alteration.

#### 3.1 Definition and Role of Developed Areas in AEI Management

Developed areas include all building structures, paved roads, improved gravel roads, paved and unpaved parking lots, and firing sites. The extent of developed areas in each AEI was determined using two methods. First, LANL geographic information system (GIS) analysts placed a 15-m (49-ft) border around all buildings and parking lots. For paved and improved gravel roads, the developed area was defined as the area to a roadside fence, if one exists within 9 m (30 ft) of the road, or 5 m (15 ft) on each side of the road if there is no fence within 9 m (30 ft). If an area of highly fragmented habitat was enclosed by roads, a security fence, or connected buildings, that area was also classified as developed. Developed areas at firing sites were defined as a circle with a 91-m (300-ft) radius from the most centrally located firing pad. Second, LANL GIS analysts overlaid scanned orthophotos onto a map of the Los Alamos area and digitized all areas that appeared developed. These two information sources were overlaid and combined, so that areas classified as developed by either method were considered developed in final maps and analyses. Some areas were confirmed by ground surveys, such as the firing sites.

Developed areas occur in the core and/or buffer of all AEIs. However, developed areas do not constitute suitable habitat for federally listed species. Current ongoing activities in developed areas constitute a baseline condition for the AEIs and are not restricted. New activities, including further development within already existing developed areas, are not restricted unless they impact undeveloped portions of an AEI core. For example, if light or noise from a new office building in a developed area were to raise levels in an undeveloped core area, those light and noise levels would be subject to the guidelines on habitat alterations.

## 3.2 General Description of Buffer Areas and Allowable Buffer Area Development

The purpose of buffer areas is to protect core areas from undue disturbance or habitat degradation. The current levels of development in buffer and core areas represent baseline conditions for this HMP. No further development is allowed in the core area under the guidelines of this HMP. A limited amount of development is allowed in buffer areas. Under the guidelines of this HMP, individual development projects are limited to 2 ha (5 ac) in size, including a 15-m (49-ft) developed-area border around structures and a 5-m (15-ft) developed-area border around paved and improved gravel roads. Projects greater than 2 ha (5 ac) in size require individual review for ESA compliance (see exceptions for fuels management activities and utility corridor maintenance). New development projects in AEI buffer areas must be reported to Los Alamos National Security, LLC (LANS) biologists for tracking (http://int.lanl.gov/environment/bio/controls/index.shtml).

## 3.3 Emergency Actions

Managers may activate emergency actions if safety and/or property is immediately threatened by something occurring within an AEI (for example, wildfire, water line breakage, etc.). Contact a LANS biologist (<a href="http://int.lanl.gov/environment/bio/controls/index.shtml">http://int.lanl.gov/environment/bio/controls/index.shtml</a>), the Environmental Stewardship Group (505-665-8855), or the DOE Los Alamos Field Office (Field Office; 505-667-6819) as soon as possible. If the emergency occurs outside of regular business hours, contact

the Emergency Management Office (505-667-6211); this office will then communicate with the appropriate LANL and DOE Field Office personnel.

## 4.0 Implementation of Site Plans

#### 4.1 Roles and Responsibilities

LANL's facility managers and operational staff are responsible for ensuring that activities are reviewed for compliance with all applicable site plans. Figure 1 illustrates the process for utilizing site plans. If activities follow approved guidance, there is no requirement for additional ESA regulatory compliance. However, additional National Environmental Policy Act (NEPA), cultural resources, wetlands, or other regulatory compliance actions may be required.

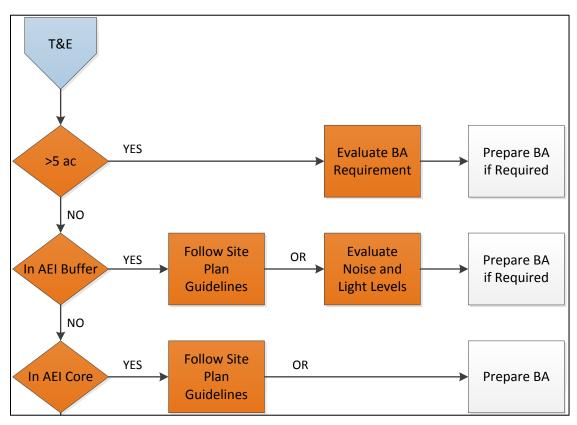


Figure 1. Process flowchart for determining site plan requirements

If an activity or project occurs outside of all LANL AEIs and will not impact habitat within an AEI, it does not have to be reviewed for ESA compliance unless it is a large project. Projects that are larger than 2 ha (5 ac) or cost more than \$5 million require an individual ESA compliance review, even if they are not located within an AEI.

LANL's facility managers are responsible for determining if operations within their geographic and/or programmatic area of responsibility comply with the guidelines in these site plans. Submission of a project into the integrated review tool for a new or modified project is required under Program Description 400 (LANL 2016) and allows managers to identify the requirements within their project area. Deployed environmental professionals and core LANS biologists are

available to support facility managers. If activities follow site plan guidelines, they do not require any additional ESA regulatory compliance action. However, NEPA, cultural resources, wetlands, or other regulatory compliance actions are not addressed in site plans and additional compliance actions may be required. It is the responsibility of the project leader or facility management staff to ensure that all requirements are satisfied. If you have questions, contact biological, cultural, NEPA, or other environmental subject matter experts. Contacts can be found at <a href="http://int.lanl.gov/environment/compliance/ier/index.shtml">http://int.lanl.gov/environment/compliance/ier/index.shtml</a>.

A single facility may have one or more AEIs within its boundary and the AEIs may be for different species. Some AEIs overlap. In areas where overlap occurs, project managers must follow the guidelines for AEIs of all involved species.

#### 4.2 If an Activity Does Not Meet Site Plan Guidelines

If a project reviewer determines that an activity or project cannot meet the guidelines in applicable site plans, LANS biologists evaluate that activity individually for compliance with the ESA. Results of the evaluation of potential impacts allow LANS biologists to make recommendations to the DOE Field Office Biological Resources Program Manager regarding the need for USFWS consultation. An evaluation may result in 1) a DOE Field Office determination that there is no effect and the activity can proceed, 2) a DOE Field Office suggestion for modifications of the action to avoid adverse effects so that it can proceed, or 3) a DOE Field Office decision to prepare a biological assessment for the activity and submit it to the USFWS for concurrence. Fieldwork and preparation of a biological assessment can take a few months with an additional 2 to 12 months for DOE Field Office review and then final USFWS concurrence.

#### 4.3 Dissemination of Information

Habitat locations of threatened and endangered species are not considered sensitive; however, it is in the best interest of threatened and endangered species to restrict specific knowledge about their locations.

## 5.0 Changes in the HMP since Implementation

The HMP received concurrence from USFWS and was first implemented in 1999. Since that time, both the Peregrine Falcon (*Falco peregrinus*) and the Bald Eagle (*Haliaeetus leucocephalus*) have been delisted. Site plans for those species have been removed from LANL's HMP. Both species are protected at LANL under the Migratory Bird Treaty Act, and the Bald Eagle is also protected under the Bald and Golden Eagle Protection Act.

In 2005, the USFWS concurred with DOE's proposal for updated Mexican Spotted Owl habitat boundaries based on a revised analysis of Mexican Spotted Owl habitat quality within DOE property around LANL (USFWS consultation number 22420-2006-I-0010).

In 2012, the USFWS concurred with DOE's proposal to modify the habitat boundaries for the Los Alamos Canyon Mexican Spotted Owl AEI due to changes from the fire response activities after the Las Conchas wildfire (USFWS consultation number 02ENNM00-2012-IE-0088).

In 2013, the USFWS concurred with the DOE's new site plan for the Jemez Mountains Salamander and its addition to LANL's HMP (USFWS consultation number 02ENNM00-2014-I-0014).

In 2015, the USFWS concurred with the DOE's addition of the New Mexico Meadow Jumping Mouse and Yellow-billed Cuckoo to LANL's HMP (USFWS consultation number 02ENNM00-2015-I-0538).

In 2017, the USFWS concurred with DOE's proposal to modify the habitat boundaries for the lower section of Water Canyon Mexican Spotted Owl AEI due to habitat degradation resulting from long-term drought and fire effects (USFWS consultation number 02ENNM00-2017-I-0255).

#### 6.0 Data Management

The data used in the implementation of the HMP are stored in a geodatabase at LANL. The current map of all of the AEIs at LANL is in Figure A-1 in the appendix.

## II. AREA OF ENVIRONMENTAL INTEREST SITE PLAN FOR THE MEXICAN SPOTTED OWL

## 1.0 Species Description—Mexican Spotted Owl

#### 1.1 Status

In 1993, the USFWS determined the Mexican Spotted Owl to be a threatened species under the authority of the ESA, as amended (58 Federal Register [FR] 14248). In 1995, the USFWS released its final recovery plan for the owl (USFWS 1995), which was revised in 2012 (USFWS 2012). The USFWS most recently designated critical habitat for Mexican Spotted Owl in 2004 (69 FR 53181).

## 1.2 General Biology

The Mexican Spotted Owl is found in northern Arizona, southeastern Utah, and southwestern Colorado south through New Mexico, west Texas, and into Mexico. It is the only subspecies of Spotted Owl recognized in New Mexico (USFWS 1995).

The Mexican Spotted Owl generally inhabits mixed conifer and ponderosa pine- (*Pinus ponderosa*; Lawson & C. Lawson) Gambel oak (*Quercus gambelli*; Nutt.) forests in mountains and canyons. High canopy closure, high stand diversity, multilayered canopy resulting from an uneven-aged stand, large mature trees, downed logs, snags, and stand decadence as indicated by the presence of mistletoe are characteristics of Mexican Spotted Owl habitat. Some owls have been found in second-growth forests (i.e., younger forests that have been logged); however, these areas were found to contain characteristics typical of old-growth forests. Mexican Spotted Owls in the Jemez Mountains prefer cliff faces in canyons for their nest sites (Johnson and Johnson 1985). The recovery plan for the Mexican Spotted Owl recommends that mixed conifer and pine-oak woodland types on slopes greater than 40 percent be protected for the conservation of this owl.

A mated pair of adult Spotted Owls may use the same home range and general nesting areas throughout their lives. A pair of owls requires approximately 800 ha (1,976 ac) of suitable nesting and foraging habitat to ensure reproductive success. Incubation is carried out by the female. The incubation period is approximately 30 days and most eggs hatch by the end of May. Most owlets fledge in June, 34 to 36 days after hatching (USFWS 1995). The owlets are "semi-independent" by late August or early September, although juvenile begging calls have been heard as late as September 30. Young are fully independent by early October. The non-breeding season runs from September 1 through February 28. Although seasonal movements vary among owls, most adults remain within their summer home ranges throughout the year.

The diet of Mexican Spotted Owls nesting in canyons consists primarily of woodrats (*Neotoma* spp.) and deermice (*Peromyscus* spp.) with lesser amounts of rabbits, birds, reptiles, and arthropods (Willey 2013). The relative abundance of prey types in Mexican Spotted Owl pellets collected at LANL are listed in Table A-1 in the appendix. Ganey and Balda (1994) found core areas of individuals (i.e., where owls spent 60 percent of their time) averaged 134 ha (331 ac), and core areas for pairs averaged 160 ha (395 ac).

#### 1.3 Threats

The Mexican Spotted Owl was listed as threatened because of destruction and modification of habitat caused by timber harvest, wildfires, increased predation on owls associated with habitat fragmentation, and a lack of adequate protective regulations.

## 2.0 Impact of Human Activities

#### 2.1 Introduction

The primary threats to Mexican Spotted Owls on LANL property are 1) impacts to habitat quality from LANL operations and 2) disturbance of nesting owls. This section provides a review and summary of scientific knowledge of the effects of various types of human activities on the Mexican Spotted Owl and provides an overview of the current levels of activities at LANL.

#### 2.2 Impacts on Habitat Quality

#### 2.2.1 Development

The type of habitat used by Mexican Spotted Owls, late seral stage forests with large trees, is usually not found in large quantities near developed areas or near areas that have had recent agricultural or forest product extraction land uses. Therefore, Mexican Spotted Owls are generally not found near developments. Whether it is the development or a lack of suitable habitat that discourages colonization of these areas by Mexican Spotted Owls is unknown.

Areas of LANL vary from remote, undeveloped areas to heavily developed and/or industrialized facilities. Most LANL facilities are situated atop mesas, primarily in the northern and western portion of the DOE property. LANL is bounded by developed residential, industrial, and retail areas along its northern boundary (the town of Los Alamos) and by residential and retail development along a portion of its eastern boundary (the town of White Rock). Three major paved roads traverse LANL from northeast to southwest. Sandia, Pajarito, and Los Alamos canyons have paved roads within AEIs, and several AEIs have dirt roads along at least a portion

of the canyon bottom. AEIs containing paved or dirt roads in the canyon bottoms have not been occupied at LANL (Hathcock et al. 2010).

## 2.2.2 Ecological Risk

There is no specific information on the impact of chemicals on the Mexican Spotted Owl, although experience with other raptor species suggests that exposure to polychlorinated biphenyls (PCBs), dichloro-diphenyl-trichloroethane (DDT) and its derivatives, and other organophosphate or organochlorine pesticides would probably be harmful. Exposure to other chemicals could also be harmful (Cain 1988).

LANS subject matter experts completed three ecological risk assessments that included the Mexican Spotted Owl between 1997 and 2009. The ecological risk assessment process involves using computer modeling to assess potential effects to animals from chemicals of potential concern that have been detected in the environment. All of the following ecological risk assessments concluded that, on average, no appreciable impact is expected to Mexican Spotted Owls from chemicals of potential concern (Gallegos et al. 1997; Gonzales et al. 2004; Gonzales et al. 2009).

#### 2.2.3 Disturbance

#### 2.2.3.1 Pedestrians and Vehicles

Based on work with other raptors, LANS biologists assume that Mexican Spotted Owls would likely be disturbed by the approach of either pedestrians or vehicles. At an equal distance, pedestrians are frequently more disturbing to raptors than vehicles (Grubb and King 1991). Brown and Stevens (1997) reported that during surveys in Grand Canyon National Park, 22 times more Bald Eagles were found in canyon reaches with low human recreational use compared to reaches with moderate to high human recreational use. Human activity 100 m (328 ft) from Bald Eagle nests in Alaska caused clear and consistent changes in behavior of breeding eagles (Steidl and Anthony 2000).

Swarthout and Steidl (2001) found that both juvenile and adult roosting Mexican Spotted Owls were unlikely to alter their behavior in the presence of a single hiker at distances greater than 55 m (180 ft). Swarthout and Steidl (2003) concluded that cumulative effects of high levels of short-duration recreational hiking near Mexican Spotted Owl nests may be detrimental.

Many canyon bottoms and mesa tops at LANL have dirt roads traversing them. Most of these roads are gated; however, these roads are accessible to LANL employees and some of them are accessible to the public on foot or by bike. LANS biologists found that AEIs are occupied less often if there is recreational access into a canyon (Hathcock et al. 2010).

#### 2.2.3.2 Aircraft

Ground-based disturbances appear to impact raptor reproductive success more than aerial disturbances (Grubb and King 1991). Grubb and Bowerman (1997) concluded that an exclusion of aircraft within 600 m (1,968 ft) of Bald Eagle nest sites would limit Bald Eagle response frequency to 19 percent.

Delaney et al. (1999) found that for Mexican Spotted Owls, chainsaws consistently elicited higher response rates than helicopters at similar distances. Owl flush rates did not differ between nesting and non-nesting seasons. No owls flushed when noise stimuli (helicopter or chainsaws) were at distances greater than 105 m (344 ft). Distance was generally a better predictor of owl response to helicopter overflights than sound level.

LANL is restricted airspace and planes infrequently fly less than 609 m (2,000 ft) above ground level. The County of Los Alamos operates an airport along the northern edge of LANL. The airport is located on the southern rim of Pueblo Canyon. Most flights approach and depart to the east of the airport, over the Rio Grande.

#### 2.2.3.3 Explosives

There is currently no specific information available on the reaction of Mexican Spotted Owls to explosives detonation. Explosive blasts set off 120 to 140 m (393 to 459 ft) from active Prairie Falcon (*Falco mexicanus*) nests caused perched Prairie Falcons to flush from perches 79 percent of the time, and, in 26 percent of the cases, caused incubating Prairie Falcons to flush from nests. Measured sound levels at aerie entrances during blasts ranged from 129 to 141 decibel (dB) (Holthuijzen et al. 1990). Explosives blasting for dam construction 560 to 1,000 m (1,837 to 3,280 ft) from active Prairie Falcon nests caused a change in behavior 26 percent of the time, and birds flushed in 17 percent of all cases. No incubating birds flushed (Holthuijzen et al. 1990). Brown et al. (1999) found little activity change in roosting or nesting Bald Eagles and no population-level impacts from weapons detonations at the Aberdeen Proving Ground. Holthuijzen et al. (1990) found that a 167-g (5.89-oz) charge of Kinestik produced noise levels between 138 and 141 dB at 100 m (328 ft), and that a 500-g (17.6-oz) charge of trinitrotoluene(2,4,6-) (TNT) produced noise levels between 144 and 146 dB at 100 m (328 ft). A 20-kg (44-lb) charge of TNT produced noise levels that measured 163 dB at 100 m (328 ft) (Paakkonen 1991).

Measurements of noise levels during explosives testing were conducted at three locations at LANL using quantities of high explosives ranging from 4.5 to 67.5 kg (10 to 148 lb) of TNT during six shots. Noise levels increased during the test from a background level of 31 A-weighted decibel [dB(A)]<sup>1</sup> to a range between 64 and 71 dB(A) during shots at a distance of 1.8 km (1.1 mi). At a distance of 4.3 km (2.67 mi), noise levels rose from a background range of 35 to 64 dB(A) to a range of 60 to 63 dB(A) (Vigil 1995). At a distance of 6.7 km (4.16 mi), noise levels rose from a background range of 38 to 51 dB(A) to a range of 60 to 71 dB(A) (Burns 1995). LANS biologists estimated that the noise from a shot at the Dual-Axis Radiographic Hydrodynamic Test (DARHT) Facility would be 150 dB(A) at the source and 80 dB(A) at 400 m (1,312 ft) (Keller and Risberg 1995). LANS biologists found that Mexican Spotted Owl AEIs located within the explosives testing buffer area were occupied more frequently than AEIs in other locations (Hathcock et al. 2010). This is likely due to the strict access control in explosives areas that limit human activity and development in the canyon bottoms.

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<sup>&</sup>lt;sup>1</sup> Sound can be measured as decibels (dB), C-weighted dB [dB(C)], or A-weighted dB [dB(A)]. The dB(A) measurement best resembles the response of the human ear by filtering out lower and higher frequency sound not normally heard by the human ear.

#### 2.2.3.4 Other Sources of Noise

Major noise-producing activities at LANL include automobile and truck traffic and noise associated with office buildings, construction activities, a live-fire range, and explosives testing. Noise is also associated with aircraft traffic at the Los Alamos County airport. Construction and maintenance activities involved with operations at LANL are fairly common. In addition, implementation of the 2016 Compliance Order on Consent issued by the New Mexico Environmental Department has resulted in an increased frequency of drilling groundwater monitoring wells in protected habitat at LANL. Also, forest fuels management operations use chainsaws, chippers, and other noise-generating equipment. The 2010 National Pollutant Discharge Elimination System Individual Permit (EPA 2010) issued by the Environmental Protection Agency requires sediment control features such as berms and small rock check dams to be installed at various sites with stormwater runoff; these are sometimes installed in protected habitat. LANS biologists conducted a study of noise levels in canyons and found that the primary sources of noise exceeding 55 dB(A) were cars and trucks. Readings taken near flowing water were up to 11 dB(A) higher than readings taken elsewhere. The average dB(A) in canyons near paved roads ranged from 41 to 62, with maximum values ranging from 62 to 74. Away from paved roads 1.6 km (1 mi) or more, average dB(A) in canyons ranged from 37 to 50, with all but one average below 45. Maximum dB(A) away from paved roads ranged from 38 to 76, 76 dB(A) was measured during a thunder clap (Huchton et al. 1997).

In December 1997, LANS biologists conducted noise measurements at the Los Alamos County airport and in Bayo and Pueblo canyons, including the Los Alamos County Sewage Treatment Facility. Sound levels near the airport runway during the maximum use time (6:30 to 7:30 am) had background values averaging 54 dB(A). Noise during plane arrivals ranged from 47 to 63 dB(A). No measurements were collected during plane take-off. Sound measurements conducted in the bottoms of Pueblo and Bayo canyons ranged from 37 to 40 dB(A) in most areas of the canyon. At the sewage treatment facility parking lot during a working day, the average dB(A) during a 3-minute period was 46 (range 45 to 49). At the intersection of the road going into Pueblo Canyon with State Road 502, the average dB(A) during a 3-minute period was 60 (range 41 to 70).

LANS biologists conducted sound measurements at successive distances from an industrial area near a canyon rim, into the canyon, and to the opposite rim, using a C-weighted decibel (dB(C) scale (Keller and Foxx 1997). Measurements of noise levels using the dB(C) scale are greater than if measured using the dB(A) scale. The average background noise on the mesa was 65.8 dB(C) [with a range of 43–81 dB(C)]. The average background noise in the canyon bottom was 62.3 dB(C) [with a range of 54–78 dB(C)]. The average background noise at the bottom of the north-facing slope was 53.8 dB(C) [with a range of 48–64 dB(C)]. Measurements were taken mid-day.

LANS biologists measured sound levels from various pieces of construction equipment used at LANL project sites over 5-minute intervals at distances of 6 to 31 m (20 to 100 ft) (Knight and Vrooman 1999). Average values ranged from 58.5 to 80.9 dB(A). Peak values ranged from 75.7 to 155.4 dB(A). Additional data were collected by other LANL operators on specific pieces of construction equipment and on the Security Computer Complex construction site fence perimeter at Technical Area 3 before and during construction (Knight and Vrooman 1999). The average

noise level before construction began was 56.6 dB(A), and the average during construction was 82.1 dB(A).

LANS biologists conducted a series of sound measurements at LANL to investigate background noise levels around AEIs (Vrooman et al. 2000). Background noise levels were significantly higher in daytime than in nighttime. AEIs with greater than a 10 percent developed area in their buffers had significantly higher levels of background noise than undeveloped AEIs. The mean background sound level was 51.3 dB(A) in developed AEIs and 39.6 dB(A) in undeveloped AEIs. The LANL biological resources project review process uses the individual AEI background measurements from Vrooman et al. (2000) to screen project activities for increases more than 6 dB(A) above background.

LANS biologists took sound level measurements of heavy equipment use associated with concrete recycling on Sigma Mesa at LANL in 2004 (Hansen 2004). At this location, background noise levels at two different locations were 55.2 and 58.8 dB(A). Operation of a dump truck hauling and dumping concrete increased noise levels above background by a mean of 22.7 dB(A) at 30 m (98 ft) and 2.4 dB(A) at 80 m (262 ft). Additional sound level measurements were taken in the same general area on Sigma Mesa in 2005 as part of a biological assessment for the operation of an asphalt batch plant (Hansen 2005). Measurements were taken on the north rim of Mortandad Canyon (south of the asphalt batch plant at distances of approximately 30 to 122 m (100 to 400 ft), at the bottom of Mortandad Canyon approximately 183 to 244 m (600 to 800 ft) from the asphalt batch plant, and on the south rim of Mortandad Canyon approximately 305 m (1,000 ft) from the asphalt batch plant. Background noise levels at the various locations ranged from 41.1 to 48.7 dB(A). The only locations with increases greater than 3 dB(A) during operation of the asphalt batch plant were the locations on the north rim of Mortandad Canyon, within 122 m (400 ft) of the asphalt batch plant. Noise from the operation of the asphalt batch plant was not detected in the bottom of Mortandad Canyon or on the south rim.

LANS biologists took sound level measurements around the LANL Biosafety Level 3 laboratory with the heating, ventilation, and air conditioning (HVAC) system on and with it off (Hansen 2009). The area to the north of the Biosafety Level 3 laboratory is developed, the area to the south is not. Background noise levels north of the facility ranged from 53.6 to 57.6 dB(A). Background noise levels south of the facility ranged from 41.6 to 49.7 dB(A). Noise from the HVAC system was detected at 25 m (82 ft) from the facility on both sides, but was not detected at 81 m (266 ft) on the north side, or at 107 m (351 ft) on the south side.

Overall, these studies appear to show that areas adjacent to or within developed areas or paved roads are likely to have daytime average background noise levels between 45 and 63 dB(A). Less disturbed areas are likely to have average background noise levels between 37 and 50 dB(A).

#### 2.2.3.5 Artificially Produced Light

There is no information available on the effects of artificially produced light on Mexican Spotted Owls. Under the Los Alamos County Code, commercial site development plans are reviewed to ensure that lighting serves the intended use of the site while minimizing adverse impacts to adjacent residential property (Section 16-276). Section 16-276 of the County Code includes light source measurement limitations by zoning district. The code allows off-site light to be 0.5 foot candles (fc) in residential areas. By comparison, full moonlight measures 0.1 fc, and a crescent

moon was measured at 0.01 fc. Table A-2 in the appendix presents preliminary light measurements in fc.

Preliminary surveys were conducted for light levels within Los Alamos Canyon at the Omega Reactor (Keller and Foxx 1997). The Omega Reactor was brightly lit for purposes of security; therefore, total light intensity was greater than the average street lighting. Measurements were conducted at a light pole in an open parking lot at the reactor as the source. Trees did not obscure the area. Using the relationship of light intensity reducing as a square of the distance, calculations using the field data indicated that at 30 m (98 ft) from the source, the light levels would be equivalent or nearly equivalent to full moonlight.

## 3.0 AEI General Description for Mexican Spotted Owl

An AEI consists of two areas—a core and a buffer. The core of the habitat is defined as suitable canyon habitat from rim to rim and 100 m (328 ft) out from the top of the canyon rim. The buffer area is 400 m (1,312 ft) wide extending outward from the edge of the core area. Although adult Mexican Spotted Owls may be found within their home range anytime throughout the year, the primary threat from disturbance to the owls is during the breeding season when owl pairs are tied to their nest sites. Therefore, management of disturbance in Mexican Spotted Owl AEIs is concentrated on the breeding season.

## 3.1 Method for Identifying a Mexican Spotted Owl AEI

The original location of each Mexican Spotted Owl AEI was identified using a habitat model developed by Johnson (1998) that classified nesting and roosting habitat for Mexican Spotted Owls using topographic characteristics and vegetative diversity. LANS biologists compared the results from the Johnson (1998) model to a different model identifying slopes >40 percent in mixed conifer and ponderosa pine cover types at LANL. Areas identified from the Johnson (1998) model application to LANL that were over five contiguous  $30 \times 30$  m (97 × 98 ft) pixels in size, were above 1,980 m (6,496 ft) in elevation, and that had mixed conifer or ponderosa pine forest cover, were considered suitable Mexican Spotted Owl habitat. Where suitable habitat was identified, AEI core area boundaries were established to include the canyons and 100 m (328 ft) outward from the canyon rims.

An updated Mexican Spotted Owl habitat model was developed and refined for application on LANL property following the Cerro Grande wildfire (Hathcock and Haarmann 2008). This model incorporated finer-scale vegetation characteristics into the Mexican Spotted Owl habitat quality assessment. This model was used to redelineate the boundaries of the Mexican Spotted Owl AEIs at LANL in 2005 following wildfire, drought, and a regional bark beetle outbreak (USFWS consultation number 22420-2006-I-0010).

The new core boundaries were delineated with an area approximately 0.4 km (0.25 mi) from the edge of the nearest suitable habitat, up and down canyon. Core boundaries were established along readily recognizable geologic features or anthropogenic features in the terrain wherever possible to facilitate the ease of identification of core boundaries when in the field.

## 3.2 Location and Number of Mexican Spotted Owl AEIs

There are currently five Mexican Spotted Owl AEIs on LANL property, each encompassing one or more canyons. In general, the AEI cores are centered in canyons on the western side of LANL. The canyons with AEIs are Cañon de Valle, Water, Pajarito, Los Alamos, Sandia, Mortandad, and Three-Mile.

## 4.0 AEI Management

#### 4.1 Overview

This AEI management section provides guidelines for LANL operations to reduce or eliminate the threats to Mexican Spotted Owls from 1) habitat alterations that reduce habitat quality and 2) disturbance of breeding or potentially breeding owls. Habitat alterations are considered for all AEIs and for both core and buffer areas. Disturbance activities to owls are considered only for occupied AEIs and only for impacts on core areas. Developed areas (see Part I, Section 3.1) that have ongoing baseline levels of activities and are not suitable habitat for Mexican Spotted Owls have different restrictions than undeveloped core or buffer areas. Therefore, the location of the disturbance activity within the AEI, the occupancy status of the AEI, and the type of activity all affect whether or not the activity is allowable. AEIs for different species may overlap, and an activity must meet the guidelines of all applicable site plans to be allowable.

## 4.2 Definition and Role of Occupancy in AEI Management

Occupancy simply refers to whether or not an AEI is occupied during a species' period of sensitivity. For Mexican Spotted Owls, the primary concern is to protect the owls from disturbance during the breeding season. Because individuals may colonize suitable habitat, all Mexican Spotted Owl AEIs are treated as though they are occupied from March 1 through August 31 or until surveys show an AEI to be unoccupied. Mexican Spotted Owl surveys are conducted from late March through June. In general, surveys in areas with ongoing or proposed projects are completed by May 15. If a nest is located during surveys, then the AEI can be treated as unoccupied except for the area within a 400 m (1,312 ft) radius of the nest site. Because owls are not as sensitive to disturbance during the non-breeding season, Mexican Spotted Owl AEIs are treated as unoccupied from September 1 to February 28.

The occupancy status of an AEI affects what activities are allowable in the AEI. Although activities causing habitat alterations are restricted in all AEIs, disturbance activities are restricted only in occupied AEIs. The Activity Table (Table 1, Section 4.5.2) provides dates and levels of allowable disturbance activities within occupied Mexican Spotted Owl AEIs under the guidelines of this site plan. Contact a LANS biologist to find out the current occupancy status of an AEI (http://int.lanl.gov/environment/bio/controls/index.shtml).

## 4.3 Introduction to AEI Management Guidelines

Sections 4.4 and 4.5 provide the guidelines for habitat alterations and allowable activities in AEI core and buffer areas. Section 4.4 describes what and where habitat alterations are allowed under the guidelines of this site plan. Section 4.5 describes what, when, and where disturbance activities are allowed in occupied AEIs under the guidelines of this site plan. If an activity does not meet the restrictions given in the guidelines, the activity must be individually reviewed for

ESA compliance. This site plan only provides guidelines for Mexican Spotted Owl AEIs. If an activity is desired in an area with overlapping AEIs, all applicable site plans must be consulted. AEI maps show the location of all AEIs in an area. Section 4.6 describes management practices that should be applied when working or considering work in an AEI. LANS biologists are available to answer questions and provide advice (http://int.lanl.gov/environment/bio/controls/index.shtml).

#### 4.4 Definition of and Restrictions on Habitat Alterations

#### 4.4.1 Definition of Habitat Alterations

Habitat alteration includes any action that alters the soil structure, vegetative components necessary to the species, prey quality and quantity, water quality, hydrology, or noise or light levels in undeveloped areas of an AEI. Long term means the alteration lasts for more than one year. For physical disturbances, in general, any activity that can be accomplished by one person with a hand tool is generally not considered habitat alteration; any activity that requires mechanized equipment on a landscape is habitat alteration. An actual activity may take place outside of the AEI and will be considered habitat alteration if consequences of the activity have effects inside the AEI core.

The habitat components most important to Mexican Spotted Owls include vegetative structure, food quality and quantity, and disturbance levels, including noise and light. The forest structure within a canyon designated as a Mexican Spotted Owl AEI is important because it provides roost sites and a suitable habitat for nesting and foraging. Trees along the canyon rim are used for foraging and territorial calling, and they shelter the canyon interior from light and noise disturbances.

A long-term change in light or noise levels within the undeveloped core of an AEI is considered to be a habitat alteration if it increases average noise levels by  $\geq 6$  dB(A) during any portion of the 24-hour day, or it increases average light levels by  $\geq 0.05$  fc at night. Changes in noise and light levels are measured at the core area boundary if the source is outside the core area, or at 10 m (33 ft) from the source if the source is inside the undeveloped core area. Impacts of changes in developed areas on undeveloped cores are measured at the developed area boundary if it is within the core, or at the core area boundary if the developed area is outside of the core.

#### 4.4.2 Fuels Management Practices to Reduce Wildfire Risk

The recovery plan for the Mexican Spotted Owl lists stand-replacing wildfires as a primary threat to their habitat and encourages land managers to reduce fuel levels and abate fire risks in ways compatible with owl presence on the landscape (USFWS 1995). Within undeveloped core areas, on slopes >40 percent, in the bottoms of steep canyons, and within 30 m (100 ft) of a canyon rim, thinning of trees <22 cm (9 in) diameter at breast height, treatment of fuels, and prescribed and natural prescribed fires are allowed. Exceptions allowing trees >22 cm (9 in) to be thinned within 30 m (100 ft) of buildings are granted to protect facilities. Large logs (>30 cm [11.8 in] midpoint diameter) and snags should be retained. Thinning within core areas not meeting the characteristics listed above, and in buffer areas, may include trees of any size to achieve 8 m (25 ft) spacing between tree crowns. However, clear cutting is not allowed in undeveloped core areas.

For health and safety reasons, any trees within 30 m (100 ft) of buildings, but outside a developed area, may be thinned to achieve 8 m (25 ft) spacing between crowns. Habitat alterations including thinning are not restricted in developed areas. However, LANS biologists encourage the retention of trees and snags along canyon rims if the rim is in a developed area. Because of the extreme fire danger associated with firing sites and the potential impact of a fire on Mexican Spotted Owl habitat, firing sites and burn areas are treated separately for the purposes of fuels management. Trees within 380 m (1,246 ft) of firing sites and burn areas in both core and buffer areas may be thinned to a 15 m (49 ft) spacing between trees everywhere except on slopes >40 percent or in the bottoms of steep canyons. Any tree over 22 cm (9 in) diameter at breast height within 380 m (1,246 ft) of a firing site may be delimbed to a height of 2 m (6 ft) to help prevent crown fires.

In historically occupied core areas, fuels treatment may not exceed 10 percent of the undeveloped core area and is not allowed within 400 m (1,312 ft) of nesting areas. In occupied core areas, forest management activities must take place during the nonbreeding season (September 1 to February 28) (USFWS 1995). Fuels management activities that are allowable in core areas must be reported to LANS biologists for tracking (http://int.lanl.gov/environment/bio/controls/index.shtml).

## 4.4.3 Utility Corridors

Habitat alterations such as cutting down trees that threaten power lines are allowed within 8 m (26 ft) of either side of an existing utility line in all areas of an AEI (Trujillo and Racinez 1995). New utility lines and utility lines requiring clearance of a right-of-way greater than 16 m (52 ft) total must be individually reviewed for ESA compliance. Disturbance activities must follow the guidelines given in the Activities Table (Table 1, Section 4.5.2) for occupied AEIs.

#### 4.4.4 Restrictions on Habitat Alterations

Habitat alterations other than the fuels management practices and utility corridor maintenance described above are not allowed in undeveloped core areas under the guidelines of this site plan. If a project or activity is planned that would alter habitat in an undeveloped core area, it must be individually evaluated for ESA compliance. Habitat alterations in undeveloped buffer areas other than the fuels management activities and utility corridor maintenance described above are restricted to 2 ha (5 ac) in area per project and are subject to other restrictions including light and noise effects in the core (see Section 2.2.3). Projects in the buffer area over 2 ha (5 ac) in size will require individual ESA compliance review.

Habitat alterations in a buffer area other than the fuels management and utility corridor maintenance described above must be reported to LANS biologists for tracking (<a href="http://int.lanl.gov/environment/bio/controls/index.shtml">http://int.lanl.gov/environment/bio/controls/index.shtml</a>). There is a cumulative maximum area that can be developed in each AEI's buffer. Once that cumulative area is reached, all habitat alterations in a buffer will require individual ESA reviews for compliance.

#### 4.5 Definition of and Restrictions on Disturbance Activities

#### 4.5.1 Definitions of Disturbance Activities

LANS biologists considered six categories of activities that might cause disturbance in an AEI. Most of the categories were first identified in the document "Peregrine Falcon Habitat Management in the National Forests of New Mexico," prepared for the United States Forest Service (Johnson 1994). LANS biologists added explosives detonation, other light production, and other noise production to provide the most comprehensive list of activities possible, thereby reducing the need for individual review of activities for ESA compliance. The categories of activities are people, vehicles, aircraft, other light production, other noise production, and explosives detonation. LANS biologists defined low, medium, and high levels of impact for these activities except for explosives detonation. Activity levels for explosives detonation have been designed to follow the guidelines agreed upon by LANL, DOE, and USFWS in the DARHT biological assessment (Keller and Risberg 1995). Restrictions on explosives detonation are described in the definition of the activity, but are not included in the Activity Table (Table 1, Section 4.5.2). These six categories of activities are restricted only in AEIs that are classified as occupied.

**People**—includes any entry of people into an AEI on foot.

- Low impact is the presence of three or fewer people per project and duration of one day or less during a breeding season.
- Medium impact is the exceedance of either the number of people or the duration criteria.
- High impact is the exceedance of both the number of people and the duration criteria.

**Vehicles**—includes the entry of any two-axle highway vehicle, all-terrain vehicle, or motorized machinery into an AEI by any route other than a paved road or an improved gravel road.

- Low impact is the presence of two or fewer vehicles per project and duration of one day or less during a breeding season.
- Medium impact is the exceedance of either the number of vehicles or the duration criteria.
- High impact is the exceedance of both the number of vehicles and the duration criteria.

**Aircraft**—includes the operation of any aircraft below an elevation of 600 m (2,000 ft) above the highest ground level in the local vicinity.

- Low impact is the presence of one single-engine airplane and the duration of one day or less during a breeding season.
- Medium impact is the exceedance of either the number of aircraft or the duration criteria.
- High impact is the exceedance of both the number of aircraft and the duration criteria.

Any use of helicopters, jet airplanes, and propeller airplanes with two or more engines is classified as medium impact or above, depending on duration.

Other Light Production—includes any activity not previously listed that causes additional light to occur in an AEI core area. For example, plans for construction of a new building at the edge of a developed area may call for lighting at night to facilitate nighttime work that impacts an undeveloped core area.

- Low impact is the increase of light intensity by ≤0.05 fc and a duration of one night or less per project per breeding season.
- Medium impact is the exceedance of either the intensity or duration criteria.
- High impact is the exceedance of both the intensity and duration criteria.

Measurements for increases in light are taken at the AEI core area boundary closest to the light source if the source is outside the core and at 10 m (33 ft) from the source if the source is inside the core. Light measurements for developed areas are taken at the edge of the developed area if the developed area is within an AEI core or at the closest core boundary if the developed area is outside of an AEI core.

**Other Noise Production**—includes any activity not previously listed except for explosives detonation that causes additional noise to occur in an AEI. For example, operation of machinery creates noise.

- Low impact is increasing noise levels in an AEI core by 6 dB(A) or less for one day or less per project per breeding season.
- Medium impact is the exceedance of either the level or the duration criteria.
- High impact is the exceedance of both the level and the duration criteria.

Measurements for increases in noise are taken at the AEI core boundary closest to the noise source if the source is outside the core and at 10 m (33 ft) from the source if the source is inside the core. Noise measurements for developed areas are taken at the edge of the developed area if the developed area is within an AEI core or at the closest core boundary if the developed area is outside of an AEI core.

Explosives Detonation—includes the use of high explosives for any purpose. LANS biologists did not define low, medium, and high levels of this activity because of the difficulty of determining levels for a shot before actually doing the shot. For the purpose of explosives detonation near Mexican Spotted Owl AEIs, occupied habitat is defined as the area within 400 m (1,312 ft) of the current year's nest/roost sites or the previous year's nest site if a current site has not been identified. No explosives detonation will take place within 400 m (1,312 ft) of nest/roost sites in occupied habitat between March 1 and August 31. Explosives detonation at night at sites within 400 to 800 m (1,312 to 2,624 ft) of a nest site in occupied habitat is restricted to once a month from March 1 and August 31. There are no restrictions on daytime explosives testing between 400 and 800 m (1,312 to 2,624 ft). There are no restrictions between September 1 and February 28 or in unoccupied habitat. Explosives detonation adjacent to AEIs that have not previously been recorded by LANS biologists as occupied will have no restrictions unless surveys detect Mexican Spotted Owls. Explosives tests not allowed under the guidelines of this site plan must be individually reviewed for ESA compliance.

## 4.5.2 Activity Table

The dates shown in the Activity Table (Table 1) are the dates between which the activity in the row is restricted under the guidelines of this site plan. All AEIs are considered occupied from March 1 to August 31 or until surveys show an AEI to be unoccupied. If owls are detected, AEIs are considered occupied until August 31 within 400 m (1,312 ft) of the nest site. Consult with LANS biologists to find out occupancy status of AEIs and what locations are within 400 m (1,312 ft) of nest sites (http://int.lanl.gov/environment/bio/controls/index.shtml).

Table 1. Restrictions on Activities in Undeveloped Occupied Mexican Spotted Owl AEIs

	<b>Levels of Impact</b>	Core	Buffer				
People	ople						
	Low	No Restrictions*	No Restrictions				
	Medium	March 1 to August 31	No Restrictions				
	High	March 1 to August 31	No Restrictions				
Vehicles							
	Low	No Restrictions	No Restrictions				
	Medium	March 1 to August 31	No Restrictions				
	High	March 1 to August 31	No Restrictions				
Aircraft	craft						
	Low	March 1 to August 31	No Restrictions				
	Medium	March 1 to August 31	March 1 to May 15				
	High	March 1 to August 31	March 1 to August 31				
Other Light Production							
	Low	March 1 to August 31 No Restrictions**					
	Medium	March 1 to August 31 No Restrictions*					
	High	March 1 to August 31	No Restrictions**				
Other Noise Production							
	Low	March 1 to August 31	No Restrictions**				
	Medium	March 1 to August 31	No Restrictions**				
	High	March 1 to August 31	No Restrictions**				
Explosives Detonation (see text in Section 4.5.1)							

<sup>\*</sup> Entry is restricted in core areas that are occupied within 400 m (1,312 ft) of the nest site from March 1 to August 31. If the current nest has not been located, entry is restricted within 400 m (1,312 ft) of the previous year's nest site.

#### 4.6 Protective Measures

This section provides a list of management practices to apply in Mexican Spotted Owl AEIs.

Timing of projects must take into account that projects in core areas or projects that
violate restrictions for occupied buffer areas must stop on February 28 each year until
occupancy status of the AEI is determined.

<sup>\*\*</sup> Noise or light production in the buffer is restricted if the activity would violate core area restrictions on noise or light.

- Make every reasonable effort to reduce the noise from explosives testing within 800 m (2,624 ft) of occupied habitat. Methods to reduce noise could include contained shots, noise shields in the direction of AEI cores, etc. For night shots, every reasonable effort should be made to limit the amount of light directed into AEI core areas.
- Install signs on dirt roads and trails leading into AEIs labeling them as restricted access areas and provide a contact number for access restrictions.
- Keep disturbance and noise to a minimum.
- Avoid unnecessary disturbance to vegetation (e.g., excessive parking areas or equipment storage areas, off-road travel, materials storage areas, crossing of streams or washes).
- Avoid removal of vegetation along drainage systems and stream channels.
- Avoid all vegetation removals not absolutely necessary.
- Employ appropriate erosion and runoff controls to reduce soil loss. The controls must be put in place and periodically checked throughout the life of projects.
- Revegetate all exposed soils as soon as feasible after construction to minimize erosion.
- Focus development away from undeveloped areas on the western end of the Los Alamos Canyon AEI.

## 5.0 Levels of Development in AEI Core and Buffers

#### 5.1 Allowable Habitat Alteration in the Buffer Areas

The following quantifications of development and guidance for allowable habitat alteration in buffer areas were published and consulted on in the 1999 version of the HMP. Most AEIs changed in dimensions during the 2005 redelineation of the habitats, and many have experienced additional development under past consultations. Many projects were reviewed and received USFWS concurrence between 1999 and 2017.

The current development status for each of the AEIs is at the end of each AEI description.

Cañon de Valle—In 1999, 16.3 ha (40.3 ac) of the core was developed and 52.2 ha (129 ac) of the buffer was developed. For this AEI, it was recommended that only an additional 25.30 ha (62.5 ac) of the AEI buffer be developed. The 1999 HMP stated that once this cap is reached or a large-scale project is proposed, additional consultation with USFWS would be required. By 2011, 28 ha (69.2 ac) of the core and 84 ha (207.5 ac) of the buffer was developed, with most of the changes due to consultations. The 2017 redelineation of the lower Water Canyon AEI resulted in another reduction of 69 ha (170 ac). The current size of this AEI is 277 ha (685 ac) of core and 524 ha (1295 ac) of buffer habitat. Of that, 21 ha (52 ac) of the current core is developed and 71 ha (176 ac) of the current buffer is developed.

**Pajarito**—In 1999, 6.7 ha (16.5 ac) of the core was developed and 75.1 ha (186.5 ac) of the buffer was developed. For this AEI, it was recommended that only an additional 35 ha (86.4 ac) of the buffer be developed. The 1999 HMP stated that once the cap is reached or a single large-scale project is proposed, additional consultation with the USFWS would be required. By 2011,

27 ha (66.7 ac) of the core and 89 ha (220 ac) of the buffer was developed, with most of the changes due to consultations. The current size of this AEI is 236 ha (585 ac) of core and 449 ha (1,111 ac) of buffer habitat. Of that, 27 ha (67 ac) of the current core is developed and 89 ha (220 ac) of the current buffer is developed.

Los Alamos—In 1999, 77.16 ha (190 ac) of the core was developed and 167.2 ha (413.1 ac) of the buffer was developed. Because this AEI is heavily developed, additional development was restricted to a few selected areas within the buffer. By 2011, 94 ha (232.2 ac) of the core and 181 ha (447.3 ac) of the buffer was developed, with most of the changes due to consultations. The current size of this AEI is 325 ha (805 ac) of core and 535 ha (1,323 ac) of buffer habitat. Of that, 64 ha (158 ac) of the current core is developed and 129 ha (319 ac) of the current buffer is developed.

Sandia-Mortandad—In 1999, 29 ha (71.7 ac) of the core was developed and 75.1 ha (185.6 ac) of the buffer was developed. For this AEI, LANS biologists recommended only an additional 38.1 ha (94.1 ac) of the buffer be developed before additional USFWS consultations take place. By 2011, 45 ha (111.2 ac) of the core and 83 ha (205.1 ac) of the buffer was developed, with most of the changes due to consultations. The current size of this AEI is 270 ha (669 ac) of core and 371 ha (918 ac) of buffer habitat. Of that, 44 ha (110 ac) of the current core is developed and 83 ha (206 ac) of the current buffer is developed.

*Three Mile*—In 1999, 3.8 ha (9.4 ac) of the core was developed and 21.5 ha (51.1 ac) of the buffer was developed. For this AEI, LANS biologists recommended only 64.3 ha (158.8 ac) additional area of buffer be developed before additional USFWS consultations take place. By 2011, 12 ha (29.6 ac) of the core and 37 ha (91.4 ac) of the buffer was developed, with most of the changes due to consultations. The current size of this AEI is 131 ha (325 ac) of core and 295 ha (730 ac) of buffer habitat. Of that, 11 ha (29 ac) of the current core is developed and 36 ha (91 ac) of the current buffer is developed.

# III. AREA OF ENVIRONMENTAL INTEREST SITE PLAN FOR THE SOUTHWESTERN WILLOW FLYCATCHER

# 1.0 Species Description—Southwestern Willow Flycatcher

### 1.1 Status

In 1995, the USFWS designated the Southwestern Willow Flycatcher as a federally endangered species (60 FR 10693). The USFWS most recently designated critical habitat for the Southwestern Willow Flycatcher in 2013 (78 FR 343). The most recent recovery plan for the Southwestern Willow Flycatcher was published in 2002 (USFWS 2002).

## 1.2 General Biology

The Southwestern Willow Flycatcher is one of four subspecies of the Willow Flycatcher. The historic range of the Southwestern Willow Flycatcher included Arizona, California, Colorado, New Mexico, Texas, Utah, and Mexico. Currently, this flycatcher breeds in riparian habitats from southern California to Arizona and New Mexico, plus southern Colorado, Utah, Nevada,

and far western Texas. In winter it is found in southern Mexico, Central America, and northern South America (USFWS 2002).

Southwestern Willow Flycatchers are present in New Mexico from early May through mid-September and breed from late May through late July (Finch and Kelly 1999; USFWS 2002; Yong and Finch 1997). The flycatcher's nesting cycle is approximately 28 days. Three or four eggs are laid at one-day intervals, and incubation begins when the clutch is complete. The female incubates eggs for approximately 12 days, and the young fledge about 13 days after hatching. Southwestern Willow Flycatchers typically raise one brood per year (USFWS 2002). Because arrival dates vary, northbound migrant Willow Flycatchers (of all subspecies) pass through areas where Southwestern Willow Flycatchers have already begun nesting. Similarly, southbound migrants (of all subspecies) in late July and August may occur where Southwestern Willow Flycatchers are still breeding. Therefore, it is only during a short period of the breeding season (approximately June15 through July 20) that a Willow Flycatcher seen within Southwestern Willow Flycatcher range is probably of that subspecies (USFWS 2002).

The Southwestern Willow Flycatcher only nests along rivers, streams, and other wetlands. It is found in close association with dense stands of willows (*Salix* spp.), arrowweed (*Pluchea* spp.), buttonbush (*Cephalanthus* spp.), tamarisk (*Tamarix* spp.), Russian olive (*Eleagnus angustifolia* L.), and other riparian vegetation, often with a scattered overstory of cottonwood (*Populus* spp.) (USFWS 2002). The size of vegetation patches or habitat mosaics used by Southwestern Willow Flycatchers varies considerably and ranges from as small as 0.8 ha (1.9 ac) to several hundred hectares (Hatten and Paradzick 2003). The Southwestern Willow Flycatcher nests in thickets of trees and shrubs approximately 2 to 15 m (6 to 49 ft) tall, with a high percentage of canopy cover and dense foliage from 0 to 4 m (0 to 13 ft) above ground. Regardless of the plant species composition or height, occupied sites always have dense vegetation in the patch interior (Allison et al. 2003; USFWS 2002).

The Southwestern Willow Flycatcher is an insectivore. It forages within and occasionally above dense riparian vegetation, taking insects on the wing and gleaning them from foliage. The flycatcher's prey includes flies, bees, wasps, ants, beetles, moths, butterflies, grasshoppers, crickets, dragonflies, damselflies, and spiders (Durst et al. 2008; Wiesenborn and Heydon 2007).

#### 1.3 Threats

The current population of Southwestern Willow Flycatchers in the United States occupies an estimated 1,214 territories (Durst et al. 2006). The distribution of breeding groups is highly fragmented, with groups often separated by considerable distances. This subspecies has suffered declines attributed to extensive loss of its cottonwood-willow habitat and to poor productivity resulting from brood parasitism by Brown-headed Cowbirds (*Molothrus ater*) (USFWS 2002).

# 2.0 Impact of Human Activities

#### 2.1 Introduction

The primary threats to the Southwestern Willow Flycatcher on LANL property are 1) impacts on habitat quality from LANL operations and 2) disturbance of nesting flycatchers. This section includes a review and summary of the known effects of various types of human activities to the

Southwestern Willow Flycatcher and an overview of the current levels of activities at LANL within species habitat.

## 2.2 Impacts on Habitat Quality

#### 2.2.1 Development

Throughout the Southwest, riparian habitats are rare and tend to be small and separated by vast expanses of arid lands. The Southwestern Willow Flycatcher has experienced extensive habitat loss and modification resulting from urban and agricultural development, water diversion and impoundment, channelization of waterways, livestock grazing, off-road vehicle and other recreational uses, and hydrological changes resulting from these and other land uses (USFWS 2002). River and stream impoundments, groundwater pumping, and overuse of riparian areas have altered as much as 90 percent of the Southwestern Willow Flycatcher's habitat (USFWS 2002). Loss of cottonwood-willow riparian forests has had widespread impact on the distribution and abundance of bird species associated with that forest. Development may be tolerated if the habitat is left intact.

Because watercourses at LANL tend to be intermittent to ephemeral, riparian habitat is uncommon. There has been extensive degradation of the riparian zone along the Rio Grande caused by feral cattle grazing and flood control operations at Cochiti Lake. There are other riparian/wetland areas on LANL property associated with canyon bottoms, the most significant being the Pajarito wetlands in the lower end of Pajarito Canyon. A major paved road parallels the wetlands area in Pajarito Canyon.

## 2.2.2 Ecological Risk

There is no specific information on the impact of chemicals on the Southwestern Willow Flycatcher.

#### 2.2.2.1 Ecorisk Assessment

LANS subject matter experts completed two ecological risk assessments between 1997 and 2009 that included the Southwestern Willow Flycatcher. The ecological risk assessment process involves using computer modeling to assess potential effects to animals from chemicals of potential concern that have been detected in the environment. The ecological risk assessments concluded that, in general, there is a small potential for effects to Southwestern Willow Flycatcher from chemicals of potential concern (Gonzales et al. 1998; Gonzales et al. 2009).

An ecotoxicological risk assessment for the Southwestern Willow Flycatcher, centered on the Pajarito wetlands, found that between 7 and 16 percent of 100 hypothetical nest sites examined had hazard indices >1.0 and <10.0, depending on the foraging scenario (Gonzales et al. 1998). This indicates a small potential for impacts from chemicals. The primary chemicals driving the risk scenario were pentachlorophenol, aluminum, radium-226, calcium, and thorium-228. Aluminum, radium, and thorium are naturally occurring substances in northern New Mexico.

#### 2.2.3 Disturbance

#### 2.2.3.1 Pedestrians and Vehicles

There is no specific information available on the reactions of Southwestern Willow Flycatchers to pedestrians and vehicles. The recovery plan for the Southwestern Willow Flycatcher recommends providing protected areas, reducing unpredictable activities, providing visual barriers, and reducing noise disturbance (USFWS 2002).

#### 2.2.3.2 Aircraft

There is no specific information available on the reaction of Southwestern Willow Flycatchers to aircraft.

LANL lies within restricted airspace and planes infrequently fly less than 609 m (2,000 ft) above ground level. The County of Los Alamos operates an airport along the northern edge of LANL. The airport is located on the southern rim of Pueblo Canyon. Most flights approach and depart to the east of the airport, over the Rio Grande.

#### 2.2.3.3 Explosives

There is no specific information available on the reaction of Southwestern Willow Flycatchers to explosives detonation. The Southwestern Willow Flycatcher AEI is not located close to any explosives testing sites at LANL.

#### 2.2.3.4 Other Sources of Noise

LANS biologists do not have good information on the effects of noise, including machinery operation, on Southwestern Willow Flycatchers. However, Southwestern Willow Flycatchers are probably not as sensitive to disturbance as some other threatened or endangered species (USFWS 2002). For a description of noise levels at LANL, see Part I, Section 2.2.3.

#### 2.2.3.5 Artificially Produced Light

There is no information available on the effects of artificially produced light on Southwestern Willow Flycatchers. Under the Los Alamos County Code, commercial site development plans are reviewed to ensure that lighting serves the intended use of the site while minimizing adverse impacts to adjacent residential property (Section 16-276). Section 16-276 of the County Code includes light source measurement limitations by zoning district. The code allows off-site light to be 0.5 fc in residential areas. By comparison, full moonlight measures 0.1 fc, and a crescent moon was measured at 0.01 fc.

# 3.0 AEI General Description for the Southwestern Willow Flycatcher

The AEI consists of two types of areas—core and buffer. Core areas represent wetland areas with suitable vegetation for nesting, primarily dense willows. The buffer area is the area within 100 m (328 ft) of core areas. The Southwestern Willow Flycatcher AEI on LANL property consists of two separate core areas. For purposes of this site plan, both core areas and associated buffers are considered one AEI unit.

## 3.1 Method for Identifying the Southwestern Willow Flycatcher AEI

The core areas were defined by the presence of riparian habitat and suitable wetland vegetation. These areas were identified in 1994 during a survey of wetlands at LANL and mapped using a global positioning system receiver. Wetlands without stands of dense willows at least 2 m (7 ft) tall and 30 m (98 ft) wide were not included in the AEI. The buffer area is the area within 100 m (328 ft) of the core areas.

## 3.2 Location of the Southwestern Willow Flycatcher AEI

There is one Southwestern Willow Flycatcher AEI on LANL property. It is composed of two core areas with associated buffers. The AEI core areas are located in the bottom of Pajarito Canyon, on the eastern side of LANL adjacent to Pajarito Road and State Road 4.

## 4.0 AEI Management

#### 4.1 Overview

This AEI management section provides guidelines for LANL operations to reduce or eliminate the threats to the Southwestern Willow Flycatcher from 1) habitat alterations that reduce habitat quality and 2) disturbance of breeding or potentially breeding flycatchers. Habitat alterations are considered for all AEIs and for both core and buffer areas. Disturbance activities to flycatchers are considered only for occupied AEIs and only for impacts on core areas. Developed areas (see Part I, Section 2.3) that have ongoing baseline levels of activities and are not suitable habitat for Southwestern Willow Flycatchers have different restrictions than undeveloped core or buffer areas. Therefore, the location of the disturbance activity within the AEI, the occupancy status of the AEI, and the type of activity all affect whether or not the activity is allowable. AEIs for different species may overlap, and an activity must meet the guidelines of all applicable site plans to be allowable. Protective measures are described as management practices that should be followed when working in AEIs.

## 4.2 Definition and Role of Occupancy in AEI Management

Occupancy simply refers to whether or not an AEI is occupied during a species' period of sensitivity. For Southwestern Willow Flycatchers, LANS biologists are primarily concerned with protecting the birds from disturbance during the breeding season. Because individuals may colonize suitable habitat, the Southwestern Willow Flycatcher AEI is treated as though it is occupied from May 15 through September 15 or until surveys show an AEI to be unoccupied. Southwestern Willow Flycatcher surveys are conducted during May, June, and July. Because Southwestern Willow Flycatchers migrate south for the winter, the AEI is treated as unoccupied from September 16 to May 14.

The occupancy status of an AEI affects what activities are allowable in the AEI. Although activities causing habitat alterations are always restricted, disturbance activities are restricted only in occupied AEIs. The Activity Table (Table 2, Section 4.5.2) provides dates and levels of disturbance activities allowable in the occupied Southwestern Willow Flycatcher AEI under the guidelines of this site plan. The dates in Table 2 indicate the time period during which the activity is restricted. Contact a LANS biologist to find out the current occupancy status of an AEI (<a href="http://int.lanl.gov/environment/bio/controls/index.shtml">http://int.lanl.gov/environment/bio/controls/index.shtml</a>).

## 4.3 Introduction to AEI Management Guidelines

Sections 4.4 and 4.5 provide the guidelines for habitat alterations and allowable activities in AEI core and buffer areas. The flowchart (see Figure 1) provides a quick reference that should be used to determine if a project or activity will affect an AEI and what sections of the site plan need to be consulted. The section on habitat alterations (Section 4.4) describes what and where habitat alterations are allowed under the guidelines of this site plan. The section and table on allowable activities (Section 4.5 and Table 2) describe what, when, and where disturbance activities are allowed in occupied AEIs under the guidelines of this site plan. If an activity does not meet the restrictions given in the guidelines, the activity must be individually reviewed for ESA compliance. This site plan only provides guidelines for the Southwestern Willow Flycatcher AEI. If an activity is desired in an area with overlapping AEIs, all applicable site plans must be consulted. Section 4.6 describes management practices that should be applied when working or considering work in an AEI. LANS biologists are available to help interpret site plans and answer questions (<a href="https://int.lanl.gov/environment/bio/controls/index.shtml">https://int.lanl.gov/environment/bio/controls/index.shtml</a>).

#### 4.4 Definition of and Restrictions on Habitat Alterations

#### 4.4.1 Definition of Habitat Alterations

Habitat alteration includes any action that over the long term alters the soil structure, vegetative components necessary to the species, prey quality and quantity, water quality, hydrology, or noise or light levels in undeveloped areas of an AEI. Long term means the alteration lasts for more than one year. Habitat alteration includes any activity that removes vegetative components important to the Southwestern Willow Flycatcher (primarily trees and shrubs). An actual activity may take place outside of the AEI and will be considered habitat alteration if consequences of the activity have effects inside the AEI core.

The habitat components most important to flycatchers include vegetative structure, food quality and quantity, and disturbance levels, including noise and light. The thickets of certain trees and shrubs along wetlands are important because they provide roost sites and a suitable habitat for nesting and foraging.

#### 4.4.2 Fuels Management Practices to Reduce Wildfire Risk

Thinning within undeveloped buffer areas may include trees of any size to achieve 7.6 m (25 ft) spacing between tree crowns. However, clear cutting is not allowed in undeveloped buffer areas. No fuels management practices are allowed in core areas. Habitat alterations including thinning are not restricted in developed areas.

#### 4.4.3 Utility Corridors

Habitat alterations such as cutting down trees that threaten power lines are allowed within 8 m (26 ft) of either side of an existing utility line in all areas of an AEI (Trujillo and Racinez 1995). New utility lines and utility lines requiring clearance of a right-of-way greater than 16 m (52 ft) total must be individually reviewed for ESA compliance. Disturbance activities must follow the guidelines given in the Activities Table (Table 2, Section 4.5.2) for occupied AEIs.

#### 4.4.4 Restrictions on Habitat Alterations

Habitat alterations other than the utility corridor maintenance described above are not allowed in undeveloped core areas under the guidelines of this site plan. Habitat alteration in buffers is limited. If a project or activity is planned that would alter habitat in an undeveloped core area, it must be individually evaluated for ESA compliance. Habitat alterations in a buffer area other than fuels management activities or utility corridor maintenance must be reported to a LANS biologist for tracking (http://int.lanl.gov/environment/bio/controls/index.shtml).

#### 4.5 Definition of and Restrictions on Disturbance Activities

#### 4.5.1 Definition of Disturbance Activities

LANS biologists considered five categories of activities that might cause disturbance in an AEI. Most of the categories were first identified in the document "Peregrine Falcon Habitat Management in the National Forests of New Mexico" prepared for the United States Forest Service (Johnson 1994). Other light production and other noise production were included to provide the most comprehensive list of activities possible, reducing the need for individual review of activities for ESA compliance. The categories of activities are people, vehicles, aircraft, other light production, and other noise production. The impact of explosives detonation on this species is not considered here because there are no explosives testing sites within 2 km (1.25 mi) of potential nesting habitat. Low, medium, and high levels of impact for these activities are considered here. The following categories of activities are restricted only in AEIs that are classified as occupied.

**People**—includes any entry of people into an AEI on foot.

- Low impact is the presence of three or fewer people per project and duration of one day or less during a breeding season.
- Medium impact is the exceedance of either the number of people or the duration criteria.
- High impact is the exceedance of both the number of people and the duration criteria.

**Vehicles**—includes the entry of any two-axle highway vehicle, all-terrain vehicle, or motorized machinery into an AEI by any route other than a paved road or an improved gravel road.

- Low impact is the presence of two or fewer vehicles per project and duration of one day or less during a breeding season.
- Medium impact is the exceedance of either the number of vehicles or the duration criteria.
- High impact is the exceedance of both the number of vehicles and the duration criteria.

**Aircraft**—includes the operation of any aircraft below an elevation of 600 m (2,000 ft) above the highest ground level in the local vicinity.

- Low impact is the presence of one single-engine airplane and duration of one day or less during a breeding season.
- Medium impact is the exceedance of either the number of aircraft or the duration criteria.

• High impact is the exceedance of both the number of aircraft and the duration criteria.

Any use of helicopters, jet airplanes, and propeller airplanes with two or more engines is classified as medium impact or above, depending on duration.

Other Light Production—includes any activity not previously listed that causes additional light to occur in an AEI core area (e.g., plans for construction of a new building at the edge of a developed area may call for lighting at night to facilitate nighttime work that impacts an undeveloped core area).

- Low impact is the increase of light intensity by up to 0.05 fc and a duration of one night or less per project per breeding season.
- Medium impact is the exceedance of either the intensity or duration criteria.
- High impact is the exceedance of both the intensity and duration criteria.

Measurements for increases in light are taken at the AEI core area boundary closest to the light source if the source is outside the core, and at 10 m (33 ft) from the source if the source is inside the core. Light measurements for developed areas are taken at the edge of the developed area if the developed area is within an AEI core, or at the closest core boundary, if the developed area is outside of an AEI core.

Other Noise Production—includes any activity not previously listed except for explosives detonation that causes additional noise to occur in an AEI. For example, operation of machinery causes noise.

- Low impact is increasing noise levels in an AEI core by 6 dB(A) or less for one day or less per project per breeding season.
- Medium impact is the exceedance of either the level or the duration criteria.
- High impact is the exceedance of both the level and the duration criteria.

Measurements for increases in noise are taken at the AEI core boundary closest to the noise source if the source is outside the core, and at 10 m (33 ft) from the source if the source is inside the core. Noise measurements for developed areas are taken at the edge of the developed area if the developed area is within an AEI core, or at the closest core boundary if the developed area is outside of an AEI core.

#### 4.5.2 Activity Table

The dates shown in the Activity Table (Table 2) are the dates between which the activity in the row is restricted under the guidelines of this site plan. Disturbance activities are of concern only when Southwestern Willow Flycatchers occupy an AEI. The AEI is always considered occupied between May 15 and September 15, or until surveys show the AEI to be unoccupied. The Southwestern Willow Flycatcher AEI is always considered unoccupied between September 16 and May 14, when flycatchers have migrated for the winter. For occupancy status of an AEI after completion of surveys, contact a LANS biologist (http://int.lanl.gov/environment/bio/controls/index.shtml).

Table 2. Restrictions on Activities in Undeveloped Occupied Southwestern Willow Flycatcher AEI

	<b>Levels of Impact</b>	Core	Buffer				
People							
	Low	No Restrictions	No Restrictions				
	Medium	May 15 to August 15	No Restrictions				
	High	May 15 to September 15 No Restrictions					
Vehicles							
	Low	May 15 to September 15	No Restrictions				
	Medium	May 15 to September 15	No Restrictions				
	High	May 15 to September 15	No Restrictions				
Aircraft							
	Low	No Restrictions No Restriction					
	Medium	May 15 to August 15	May 15 to August 15				
	High	May 15 to September 15	May 15 to August 15				
Other Light/Noise Production							
	Low	May 15 to September 15	No Restrictions*				
	Medium	May 15 to September 15	No Restrictions*				
	High	May 15 to September 15	No Restrictions*				

<sup>\*</sup> Noise or light production in the buffer is restricted if the activity would violate core area restriction on noise or light.

#### 4.6 Protective Measures

This section provides a list of management practices to apply in the AEI.

- No wetland vegetation will be removed outside of developed areas.
- Employ appropriate erosion and runoff controls to reduce soil loss.
- Avoid unnecessary disturbance to vegetation (e.g., excessive parking areas or equipment storage areas, off-road travel, materials storage areas, crossing of streams or washes).
- Avoid removal of vegetation along drainage systems and stream channels.
- Avoid all vegetation removals not absolutely necessary.
- Appropriate erosion controls must be put in place and periodically checked throughout the life of any projects.
- Revegetate all exposed soils as soon as feasible after disturbance to minimize erosion.

## 5.0 Southwestern Willow Flycatcher AEI Description

# 5.1 Pajarito Canyon Southwestern Willow Flycatcher AEI

#### 5.1.1 Allowable Habitat Alteration in the Buffer Area

Since the purpose of the buffer area is to help maintain the core area as suitable Southwestern Willow Flycatcher habitat, habitat alteration in the buffer area will be extremely limited. There are two areas in which restrictions on habitat alteration are relaxed.

- 1. The mesa top of Mesita del Buey. This mesa top can be developed as long as restrictions on impacts to the core area are met.
- 2. Pajarito Road within the AEI. Mowing of upland vegetation is allowed up to 5 m (15 ft) from Pajarito Road, or to the fence, if the fence is within 9 m (30 ft). Vegetation must cover the roadsides to prevent sediment runoff, so mowed plants should be at least 5 cm (2 in) high. LANS biologists encourage the growth of willow throughout the AEI—even the area along Pajarito Road—to enhance habitat. If, within this area, it is absolutely necessary to remove new willow growth (i.e., to improve visibility for human safety), LANS biologists recommend that only willows at or above the level of the roadway surface be mowed.

# IV. AREA OF ENVIRONMENTAL INTEREST SITE PLAN FOR THE JEMEZ MOUNTAINS SALAMANDER

# 1.0 Species Description—Jemez Mountains Salamander

#### 1.1 Status

The Jemez Mountains Salamander was listed in New Mexico as endangered under the Wildlife Conservation Act of New Mexico in 2006 (NMDGF 2006). In September 2012 the USFWS proposed the Jemez Mountains Salamander as endangered under the ESA (77 FR 56481) and the final listing as endangered was on September 10, 2013 (78 FR 55599).

# 1.2 General Biology

The Jemez Mountains Salamander is endemic to the Jemez Mountains of north-central New Mexico and is found in Los Alamos, Rio Arriba, and Sandoval counties (Stebbins and Riemer 1950). It is one of two endemic plethodontid salamanders that occur in New Mexico. It occurs predominantly at elevations between 2,130 to 3,430 m (6,988 to 11,254 ft) in mixed-conifer forest with greater than 50 percent canopy cover consisting mainly of Douglas fir (*Pseudotsuga menziesii* [Mirb.] Franco), blue spruce (*Picea pungens* Engelm.), Engelmann spruce (*Picea engelmannii* Parry ex Engelm.), white fir (*Abies concolor* [Gord. & Glend.] Lindl. ex Hildebr.), limber pine (*Pinus flexilis* James), ponderosa pine, and quaking aspen (*Populus tremuloides* Michx.). The ground surface in forest areas has (a) moderate to high volumes of large fallen trees and other woody debris, especially coniferous logs at least 25 cm (10 in) in diameter, particularly Douglas fir, which are in contact with the soil in varying stages of decay from freshly fallen to nearly fully decomposed; or (b) structural features, such as rocks, bark, and

moss mats that provide the species with food and cover. Underground habitat in forest or meadow areas contains interstitial spaces provided by (a) igneous rock with fractures or loose rocky soils, (b) rotted tree root channels, or (c) burrows of rodents or large invertebrates (Degenhardt et al. 1996; 78 FR 9876).

Plethodontid salamanders, which lack both lungs and gills, breathe through the mucous membranes in their mouth and throat and through their moist skin. The Jemez Mountains Salamander is completely terrestrial and does not use standing surface water for any life stage (77 FR 56481). Present in its habitat year-round, the Jemez Mountains Salamander spends most of its life underground, but can be found on the surface when conditions are warm and wet, approximately July through October. During this time, the Jemez Mountains Salamander can be found under rocks, bark, and moss mats, and inside and under logs (Ramotnik 1986, Everett 2003). The Jemez Mountains Salamander eats invertebrates, including ants, mites, and beetles, and is thought to lay its eggs underground (78 FR 9876).

#### 1.3 Threats

Principal threats to habitat include historical fire exclusion and suppression and severe wildland fires; forest composition and structure conversions; post-fire rehabilitation; forest and fire management; roads, trails, and habitat fragmentation; recreation; and disease (77 FR 56482).

## 2.0 Impact of Human Activities

#### 2.1 Introduction

Primary threats to the Jemez Mountains Salamander on LANL property are impacts to habitat quality or destruction of individual salamanders caused by LANL or Los Alamos County operations. Forested LANL property is also subject to impacts from severe wildland fire and wildfire suppression.

#### 2.2 Impacts on Habitat Quality

## 2.2.1 Development

Property at LANL varies from remote isolated land to heavily developed and/or industrialized. Most of the large developed areas at LANL are found on mesa tops, generally in the northern and western portion of LANL. The areas of Jemez Mountains Salamander habitat currently most impacted by development occur in Los Alamos Canyon. There is a secondary paved road (West Road) in the bottom of the canyon that exits the canyon on the north-facing slope through Jemez Mountains Salamander habitat. The canyon bottom also contains a recreational ice rink operated by Los Alamos County on an inholding owned by Los Alamos County. Development that reduces the occurrence of primary constituent elements of Jemez Mountains Salamander in core habitat would likely have a negative impact on the species.

#### 2.2.2 Pedestrians and Vehicles

Many canyon bottoms and mesa tops at LANL have dirt roads traversing them. Most of these roads are gated; however, many of these roads are accessible to LANL employees and the public on foot or by bike. Some areas, such as Los Alamos Canyon, are frequently used by hikers and dog owners on active and historic trails that traverse the canyon, through Jemez Mountains

Salamander habitat in places. Maintenance of roads and trails in the habitat may have a negative impact on the species.

## 2.2.3 Severe Wildland Fire and Wildfire Suppression

Stand-replacing wildfires significantly change forest composition and structure, and reduce canopy cover. Even ground wildfires may reduce the volume of fallen logs and large woody debris. Large areas of historic Jemez Mountains Salamander habitat have been impacted by stand-replacing wildfires associated with current forest stocking conditions, drought, and high temperatures (77 FR 56482). Forested habitats on LANL property are also subject to severe wildland fires. To mitigate wildfire risks, some areas of LANL have been treated for fuels reduction and creation of fuel breaks both pre-emptively and during active wildfire suppression. Both wildfires and wildfire suppression activities can negatively impact the primary constituent elements of Jemez Mountains Salamander core habitat.

## 2.3 Impacts on Individual Salamanders

#### 2.3.1 Disease

The amphibian pathogenic fungus *Batrachochytrium dendrobatidis* (Bd) was found in a wild-caught Jemez Mountains Salamander in 2003 (Cummer et al. 2005) on the east side of the species' range and again in another Jemez Mountains Salamander in 2010 on the west side of the species' range (77 FR 56482). Bd causes the disease chytridiomycosis, whereby the Bd fungus attacks keratin in amphibians. In adult amphibians, keratin primarily occurs in the skin. The symptoms of chytridiomycosis can include sloughing of skin, lethargy, morbidity, and death. Chytridiomycosis has been linked with worldwide amphibian declines, die-offs, and extinctions, possibly in association with climate change (Pounds et al. 2006). Chytridiomycosis may be a threat to the Jemez Mountains Salamander because this disease is a threat to many other species of amphibians and the pathogen has been detected in the Jemez Mountains Salamander (77 FR 56482).

As part of a cooperative study with the New Mexico Department of Game and Fish between 2007 and 2013, various amphibian species, including the canyon tree frog (*Hyla arenicolor*), western chorus frog (*Pseudacris triseriata*), Woodhouse's toad (*Anaxyrus woodhousii*), tiger salamander (*Ambystoma tigrinum*), and Jemez Mountains Salamander were tested for Bd infection at LANL. To date, all sampling has been negative for Bd infection (Fresquez et al. 2013).

## 2.3.2 Destruction of Individual Salamanders

During periods of the year when Jemez Mountains Salamanders are on the soil surface, when conditions are warm and wet (generally July to October), they are vulnerable to injury and mortality from soil-disturbing activities, including operation of heavy equipment in core habitat. They also are at risk to be found and collected by people.

## 3.0 AEI General Description for the Jemez Mountains Salamander

The AEI consists of two areas—a core area and a buffer area. The core habitat is defined as suitable habitat where the Jemez Mountains Salamander occurs or may occur at LANL. The core habitat consists of sections of north-facing slope that contain the required micro-habitat to

support Jemez Mountains Salamander. The buffer area is 100 m (328 ft) wide extending outward from the edge of the core area.

## 3.1 Method for Identifying a Jemez Mountains Salamander AEI

The first step in identifying potential Jemez Mountains Salamander AEIs at LANL was to use a GIS to model habitat. Early modeling efforts by Hathcock (2008) identified areas of potential habitat and that model was further refined. The following parameters were modeled in the GIS:

• Elevation: 2,150 m (7,000 ft) and above

• Slope: Greater than 20 degrees

• Aspect: north-facing +/- 20 degrees

• Land cover: Mixed conifer

• Land use: Undeveloped

• Modeled habitat is only selected if it is greater than five contiguous  $30 \times 30$  m (98 × 98 ft) pixels in size

Once this habitat layer was developed, a second layer was modeled that examined the level of shade in the habitat, also known as an illumination index. Since the Jemez Mountains Salamander needs cool moist conditions, an illumination index model would further highlight areas where this habitat type may occur or further reinforce the areas selected by the GIS modeling. The illumination index describes the amount and extent of solar radiation reaching the Earth's surface at a given point. This takes into account the topography that may cast shadows. The illumination model was developed using the 5 m (16 ft) resolution digital elevation model hillshade and using the Surface toolbox in ArcToolbox (Environmental Science Research Institute, Redlands, California) using the highest height of the sun on June 21 at 1:00 pm, altitude of 74.4 and Azimuth of 178.4, when the sun would be at its maximum height. These procedures were based on work done by Reilly et al. (2009).

Once this modeling was complete, LANS biologists performed field validation to verify the suitability of the modeled habitat. The goal was to verify that mixed conifer was still the dominant cover class in the selected area. The GIS analysis used data from a landcover map created by McKown et al. (2003). There have been changes in habitat from fire and extreme drought effects since this landcover map was published. Since LANL is on the extreme edge of Jemez Mountains Salamander lower elevational range, a key component in this part of its range is soil moisture content. During field validation, evidence of a moist mixed conifer habitat versus a dry mixed conifer habitat was noted. One of the key indicators used to delimit areas of moist versus dry mixed conifer during the field validation was the presence of white fir (Evans et al. 2011) combined with a high canopy cover.

Field validation of the model occurred in May 2013, or decisions were based on earlier field visits to the sites from other projects. Each field validation consisted of LANS biologists walking down all of the modeled habitat polygons to look for the presence of indictor features. If a polygon of modeled habitat contained white fir, indicating a moist wet conifer type habitat, a high canopy closure, and other signs of high habitat quality such as dead logs, moss, or other

areas that could be used as cover by the Jemez Mountains Salamander, then the polygon was marked for retention in the final core habitat. Polygons that did not contain the necessary habitat requirements were omitted.

After the field validation was complete, the final core habitat boundaries were hand digitized using ArcGIS (Environmental Science Research Institute, Redlands, California) by LANS biologists in and around the validated modeled polygon and areas between polygons, if appropriate. The final identified core habitat at LANL occurs on the north-facing slopes of canyons. Toward the rim of the canyon, the core boundaries end where the mixed conifer ends. In the canyon bottoms, the core boundary extends to the edge of the stream channel. The upstream and downstream core boundaries end where the mixed conifer ends. A buffer habitat was extended around the core to a distance of 100 m (328 ft) outward. The LANL Fenton Hill satellite facility in the Jemez Mountains off of New Mexico Highway 126 is on land leased to DOE by the Santa Fe National Forest. The entire footprint is considered to be developed core habitat for the Jemez Mountains Salamander, since proposed critical habitat is adjacent to the facility.

#### 3.2 Location and Number of Jemez Mountains Salamander AEIs

The identified Jemez Mountains Salamander core habitats were grouped by canyon system into AEIs, which contain contiguous and noncontiguous habitat areas. The largest contiguous section of habitat at LANL is in Los Alamos Canyon. There are two noncontiguous areas of habitat in Two-mile Canyon, four in Pajarito Canyon, one contiguous area in Cañon de Valle, and the entire Fenton Hill footprint.

## 4.0 AEI Management

#### 4.1 Overview

This AEI management section provides guidelines for LANL operations to reduce or eliminate the threats to the Jemez Mountains Salamander from habitat alterations that reduce habitat quality. Habitat alterations are considered for all AEIs and for both core and buffer areas. Developed areas that have ongoing baseline levels of activities and are not suitable habitat for Jemez Mountains Salamander have different restrictions than undeveloped core or buffer areas. AEIs for different species may overlap, and an activity must meet the guidelines of all applicable site plans to be allowable. Protective measures are described as management practices that should be followed when working in AEIs.

# 4.2 Definition and Role of Occupancy in AEI Management

Occupancy simply refers to whether or not an AEI is occupied by the Jemez Mountains Salamander. The Los Alamos Canyon AEI is known to be occupied based on past surveys. Surveys for the Jemez Mountains Salamander are known to have a very low detection rate for occupied areas, so at LANL, all AEIs are assumed to be occupied at all times. If needed, site-specific surveys will be conducted by federally permitted LANS biologists.

## 4.3 Definition and Role of Developed Areas in AEI Management

Developed areas include all building structures, paved roads, improved gravel roads, and paved and unpaved parking lots. The majority of Jemez Mountains Salamander core habitat is in

undeveloped areas, except for the satellite facility at Fenton Hill and a small amount of habitat in Los Alamos Canyon where West Road crosses the habitat. Generally, developed areas will not have restrictions; however, some of the undeveloped sections within the footprint of Fenton Hill may have restrictions because they may contain Jemez Mountains Salamanders when they move to the surface between July and October. Any project that occurs within developed core habitat will be evaluated by LANS biologists for ESA compliance.

# 4.4 General Description of Core and Buffer Areas and Allowable Area Development

The purpose of buffer areas is to protect core areas from habitat degradation. The current levels of development in buffer and core areas represent baseline conditions for this site plan. No further development is allowed in the core area under the guidelines of this site plan. Any development in a buffer area will be reviewed by LANS biologists to ensure that there are no impacts to the core habitat.

# 4.5 Emergency Actions

If safety and/or property are immediately threatened by something occurring within an AEI (for example, wildfire, water line breakage, etc.) please contact a LANS biologist (505-665-3366) as soon as possible. If the emergency occurs outside of regular business hours, contact the Emergency Management Office (505-667-6211). This office will then communicate with the appropriate LANS personnel.

## 4.6 Introduction to AEI Management Guidelines

Section 4.7 provides the guidelines for habitat alterations and allowable activities in AEI core and buffer areas. It describes what and where habitat alterations are allowed under the guidelines of this site plan. If an activity does not meet the restrictions given in the guidelines, the activity must be individually reviewed for ESA compliance. This site plan only provides guidelines for the Jemez Mountains Salamander AEIs. If an activity is desired in an area with overlapping AEIs, all applicable site plans must be consulted. AEI maps show the location of all AEIs in an area. LANS biologists are available to help interpret site plans and answer questions (http://int.lanl.gov/environment/bio/controls/index.shtml).

#### 4.7 Definition of and Restrictions on Habitat Alterations

#### 4.7.1 Definition of Habitat Alterations

Habitat alteration includes any action that alters the soil structure, vegetative components necessary to the species, water quality, or hydrology in undeveloped areas of an AEI. An actual activity may take place outside of the AEI and will be considered habitat alteration if consequences of the activity have effects inside the AEI core. Habitat alterations would also include soil pits for soil samples deeper than 15 cm (6 in) using either hand or mechanized augers. Any activity that might disturb the soil will need to be reviewed by LANS biologists.

The habitat components most important to the Jemez Mountains Salamander include soil structure and vegetative structure. The forest structure within an area designated as a Jemez Mountains Salamander AEI is important because it provides the necessary moist, cool microclimate.

## 4.7.2 Fuels Management Practices to Reduce Wildfire Risk

One of the primary threats to the Jemez Mountains Salamander is wildfire (77 FR 56482), but they also require habitat with a high canopy cover, which makes fuels reduction challenging. Within undeveloped core areas, thinning trees to a level of 80 percent canopy cover or higher is approved. Trees may not be thinned below 80 percent canopy cover without further ESA review by LANS biologists. Large logs on the ground should be left in place and not chipped. Understory thinning that does not reduce total canopy cover below 80 percent is permitted. Large trees that are felled should be left as large logs on the ground. Smaller trees and understory shrubs that may be thinned should be dispersed and left on-site to aid in soil moisture retention. Thinning activities should not occur during the rainy season between July to October (or when freezing temperatures begin, whichever comes first) when the Jemez Mountains Salamander is found on the surface.

In buffer areas, thinning of trees can occur to the current LANL-approved prescription level (LAAO 2000). LANS biologists are available to provide guidance and mark trees for thinning (http://int.lanl.gov/environment/bio/controls/index.shtml).

## 4.7.3 Utility Corridors

Habitat alterations such as cutting down trees that threaten power lines are allowed within 8 m (26 ft) of either side of an existing electrical utility line at LANL under existing guidelines and engineering controls (Hathcock 2013). This level is approved in all areas of an AEI. New utility lines and utility lines requiring clearance of a right-of-way greater than 16 m (52 ft) total in core habitat must be individually reviewed for ESA compliance.

#### 4.7.4 Restrictions on Habitat Alterations

Habitat alterations other than the fuels management practices and utility corridor maintenance described above are not allowed in undeveloped core areas under the guidelines of this site plan. If a project or activity is planned that would alter habitat in an undeveloped core area, it must be individually evaluated for ESA compliance. Habitat alterations in buffer areas must be reviewed by LANS biologists to ensure that there are no impacts to core habitat.

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# **APPENDIX**

Table A-1. The Percentage of each Food Type Found in Mexican Spotted Owl Food Remains at LANL

Species	<b>Relative Abundance</b>		
Neotoma spp.	26.22		
Peromyscus spp.	10.22		
Microtus spp.	4.44		
Gophers	4.89		
Bats	5.78		
Chipmunks	0.89		
Rabbits	12.89		
Shrews	1.33		
Small Mammal	1.33		
Medium Mammal	1.78		
Medium Bird	8.00		
Small Bird	4.89		
Nocturnal Birds	0.89		
Reptiles	4.89		
Arthropods	11.56		

Table A-2. Preliminary Light Measurements in ftc for Mexican Spotted Owl Site Plan

		Distance from Source			
	Source (street light)	5 m	10 m	15 m	20 m
ftc	3.70	2.28	1.20	0.62	0.32

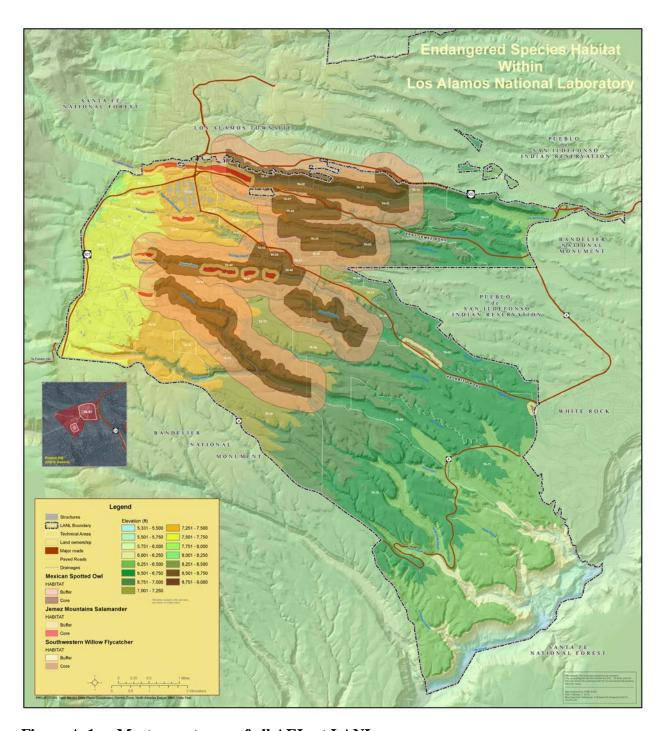


Figure A-1. Most recent map of all AEIs at LANL

ATTACHMENT 14: MSGP IPAC TRUST RESOURCES REPORT

# **MSGP**

# IPaC Trust Resource Report

Generated July 27, 2015 07:29 PM MDT



US Fish & Wildlife Service

# **IPaC Trust Resource Report**



# **Project Description**

NAME

**MSGP** 

PROJECT CODE

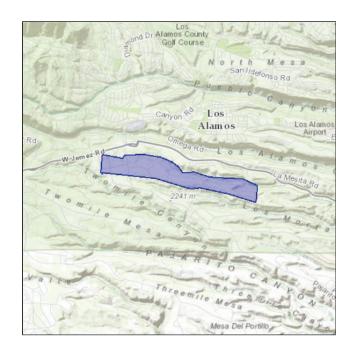
LXATM-TI5EJ-BAJEQ-3NC5E-SOGYTE

LOCATION

Los Alamos County, New Mexico

DESCRIPTION

Facilities that discharge to Sandia Canyon within TA-3 and TA-60. Industrial facilities subject to the MSGP. July, 2015.



# U.S. Fish & Wildlife Contact Information

Species in this report are managed by:

New Mexico Ecological Services Field Office 2105 Osuna Road Ne Albuquerque, NM 87113-1001 (505) 346-2525

# **Endangered Species**

Proposed, candidate, threatened, and endangered species that are managed by the Endangered Species Program and should be considered as part of an effect analysis for this project.

This unofficial species list is for informational purposes only and does not fulfill the requirements under <u>Section 7</u> of the Endangered Species Act, which states that Federal agencies are required to "request of the Secretary of Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action." This requirement applies to projects which are conducted, permitted or licensed by any Federal agency.

A letter from the local office and a species list which fulfills this requirement can be obtained by returning to this project on the IPaC website and requesting an Official Species List from the regulatory documents section.

## **Amphibians**

### Jemez Mountains Salamander Plethodon neomexicanus

**Endangered** 

CRITICAL HABITAT

There is final critical habitat designated for this species.

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=D019

### **Birds**

### Mexican Spotted Owl Strix occidentalis lucida

**Threatened** 

CRITICAL HABITAT

There is **final** critical habitat designated for this species.

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B074

### Southwestern Willow Flycatcher Empidonax traillii extimus

**Endangered** 

CRITICAL HABITAT

There is final critical habitat designated for this species.

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B094

### Yellow-billed Cuckoo Coccyzus americanus

**Threatened** 

CRITICAL HABITAT

There is **proposed** critical habitat designated for this species.

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B06R

### **Mammals**

### New Mexico Meadow Jumping Mouse Zapus hudsonius luteus

**Endangered** 

CRITICAL HABITAT

There is **proposed** critical habitat designated for this species.

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=A0BX

# **Critical Habitats**

Potential effects to critical habitat(s) within the project area must be analyzed along with the endangered species themselves.

There is no critical habitat within this project area

# Migratory Birds

Birds are protected by the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act.

Any activity which results in the take of migratory birds or eagles is prohibited unless authorized by the U.S. Fish and Wildlife Service (1). There are no provisions for allowing the take of migratory birds that are unintentionally killed or injured.

You are responsible for complying with the appropriate regulations for the protection of birds as part of this project. This involves analyzing potential impacts and implementing appropriate conservation measures for all project activities.

Bald Eagle Haliaeetus leucocephalus

Bird of conservation concern

Season: Wintering

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B008

Bendire's Thrasher Toxostoma bendirei

Bird of conservation concern

Season: Breeding

Brewer's Sparrow Spizella breweri

Bird of conservation concern

Season: Migrating

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HA

**Brown-capped Rosy-finch** Leucosticte australis

Bird of conservation concern

Season: Wintering

Burrowing Owl Athene cunicularia

Bird of conservation concern

Season: Breeding

Cassin's Finch Carpodacus cassinii

Bird of conservation concern

Year-round

Flammulated Owl Otus flammeolus

Bird of conservation concern

Season: Breeding

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0DK

Fox Sparrow Passerella iliaca

Bird of conservation concern

Season: Wintering

Golden Eagle Aquila chrysaetos

Bird of conservation concern

Year-round

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0DV

Grace's Warbler Dendroica graciae

Bird of conservation concern

Season: Breeding

Juniper Titmouse Baeolophus ridgwayi

Bird of conservation concern

Year-round

Lewis's Woodpecker Melanerpes lewis

Bird of conservation concern

Year-round

Loggerhead Shrike Lanius Iudovicianus

Bird of conservation concern

Year-round

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0FY

Mountain Plover Charadrius montanus

Bird of conservation concern

Season: Breeding

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B078

Olive-sided Flycatcher Contopus cooperi

Bird of conservation concern

Season: Breeding

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0AN

Peregrine Falcon Falco peregrinus

Bird of conservation concern

Season: Breeding

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0FU

Pinyon Jay Gymnorhinus cyanocephalus

Bird of conservation concern

Year-round

Prairie Falcon Falco mexicanus

Bird of conservation concern

Year-round

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0ER

Swainson's Hawk Buteo swainsoni

Season: Breeding

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B070

Williamson's Sapsucker Sphyrapicus thyroideus

Bird of conservation concern

Bird of conservation concern

Season: Breeding

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0FX

Willow Flycatcher Empidonax traillii

Bird of conservation concern

Season: Breeding

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0F6

# Refuges

Any activity proposed on National Wildlife Refuge lands must undergo a 'Compatibility Determination' conducted by the Refuge. If your project overlaps or otherwise impacts a Refuge, please contact that Refuge to discuss the authorization process.

There are no refuges within this project area

### Wetlands

Impacts to <u>NWI wetlands</u> and other aquatic habitats from your project may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal Statutes.

Project proponents should discuss the relationship of these requirements to their project with the Regulatory Program of the appropriate <u>U.S. Army Corps of Engineers District</u>.

### **DATA LIMITATIONS**

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

### DATA EXCLUSIONS

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

### DATA PRECAUTIONS

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

There are no wetlands identified in this project area

### ATTACHMENT 15: EPC-CP-QAPP-MSGP

The EPC-CP-QAPP-MSGP is in the process of being updated and finalized. The current document, ENV-CP-QAPP-MSGP R-5, is included in the attachment and will be replaced in the hard copy of the SWPPP once the new document is completed.

# ENV-CP-QAPP-MSGP, R5 Effective Date: 11/04/2013 Next Review Date: 11/04/2015



**Environment, Safety, Health Directorate** 

**Environmental Protection Division – Compliance Programs Group** 

**Quality Assurance Project Plan** 

# Stormwater Multi-Sector General Permit for Industrial Activities Program

Reviewers:				
Name:	Organization:	Signature:	Date:	
Melanie Lamb	ADESH-OIO, QA Specialist	Signature on File		
Derivative Classifier: ☐ Unclassified ⊠ DUSA <u>ENVPRO</u>				
Name:	Organization:	Signature:	Date:	
Ellena Martinez	ADESH-OIO	Signature on File		
	Approval	Signatures:		
Subject Matter Expert:	Organization:	Signature:	Date:	
Holly Wheeler	ENV-CP	Signature on File		
Responsible Line Manager:	Organization:	Signature:	Date:	
Mike Saladen	ENV-CP, Team Lead	Signature on File		
Responsible Line Manager:	Organization:	Signature:	Date:	
	ENV-CP, Group Leader	Signature on File		

### CONTROLLED DOCUMENT

This copy is uncontrolled. The controlled copy can be found on the ENV Division Web page.

Users are responsible for ensuring they work to the latest approved version.

Stormwater MSGP for Industrial Activities Program	No. ENV-CP-QAPP-MSGP, R5	Page 2 of 40
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# **History of Revisions**

<b>Document Number</b> [Include revision number, beginning with Revision 0]	Effective Date [Document Control Coordinator inserts effective date]	Description of Changes [List specific changes made since the previous revision]
0	06/03	New Document
1	12/05	Annual review and revision
2	07/07	Annual review, incorporated organizational restructure changes.
3	07/09	Biennial Review and Revision
4	07/09	Biennial Review and Revision
5	10/13	Biennial Review and Revision. New format implemented.

Effective Date: 11/04/2013

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### 1.0 QUALITY PROGRAM

LANL will comply with the monitoring requirements as specified by the 2008 National Pollutant Discharge Elimination System (NPDES) Stormwater Multi-Sector General Permit for Industrial Activities. Compliance will be demonstrated through the successful implementation of this project plan and applicable procedures.

Los Alamos National Laboratory (the Laboratory) has established a comprehensive stormwater program for its industrial activities. Historically, the Laboratory operated under the NPDES Baseline General Permit and then under the NPDES 1995, 2000, and 2008 Multi-Sector General Permits. The Laboratory submitted its NOI for 2008 coverage in December 2008.

The 2008 MSGP was issued on September 22, 2008 and became effective on September 29, 2008.

The purpose of this project plan is to ensure compliance with the following:

- 2008 NPDES Multi-Sector General Permit (MSGP) and the Clean Water Act (CWA)
- DOE Order 450.1, *Environmental Protection Program*, and DOE Order 5400.5, *Radiation Protection of the Public and Environment*, which establish environmental protection program policies, requirements, and responsibilities

The Environmental Protection, Environmental Compliance Programs (ENV-CP) Water Quality Team has been tasked with overseeing institutional stormwater compliance related activities at the Laboratory.

### 1.1 QUALITY PROGRAM PURPOSE

This Quality Assurance Project Plan (QAPP) describes the policies and requirements that ensure MSGP activities are conducted in a consistent, agreed-upon manner.

This QA Project Plan describes the policies and requirements that ensure the MSGP processes are conducted in a consistent, agreed-upon manner. Drivers for the quality plan include:

- o DOE Order 414.1C, Quality Assurance
- o SD330, LANL Quality Assurance Program

This QA Project Plan (QAPP), including implementing procedures, is a sub-tier document to the SD330, *LANL Quality Assurance Program*. The following documents provide requirements to ensure that the MSGP Program is operated in accordance with established plans and procedures:

- SD330, LANL Quality Assurance Program
- QA Project Plan for the MSGP (this document)
- Implementing procedures

### 1.2 ORGANIZATION

ENV-CP is responsible for compliance oversight of the Laboratory's MSGP coverage. The Group is organized by teams under the line management direction of the Group Leader. Teams are crossfunctional and focus on specific Laboratory water quality responsibilities, deliverables, or

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products. Teams are guided by Team Leaders who have the responsibility to assure the program is completed and properly implemented.

The Team Leader coordinates the project and reports to the ENV-CP Group Leader. The Project Lead implements program oversight, coordinates contractor efforts (if there are any), and reports to the Team Leader. A QA Specialist is assigned to work for the Team Leader to provide quality assurance assistance, advice, and review. In addition, representatives from other groups may participate and contribute to this team as subject matter experts for project activities. The project organization is shown in Attachment 1.

Applicable regulatory drivers include the following:

- Clean Water Act (CWA)
- 2008 NPDES Multi-Sector General Permit (MSGP)
- DOE Order 450.1, Environmental Protection Program
- DOE Order 5400.5, Radiation Protection of Public and Environment
- P401, Procedure to Identify, Communicate, and Implement Environmental Requirements

### 1.3 RESPONSIBILITIES

The following table lists specific responsibilities:

Who	What
Group Leader	Assure that qualified staff complies with regulatory requirements associated with the MSGP.
Project Lead	Ensure that MSGP-related activities are performed in accordance with the requirements specified in this plan.
ENV-CP Staff	Perform MSGP-related activities as assigned by the Team Leader or Project Leader

### 2.0 PERSONNEL DEVELOPMENT

Qualified team members will be hired and trained as prescribed in ENV-DO-QP-115, *Personnel Training*. Minimum training requirements for ENV personnel are described in the ENV Division Qualification Standards. The LANL Human Resources Division maintains documentation of education qualification. Required MSGP qualifications and training plans are listed below.

### 2.1 MSGP CURRICULA

The MSGP Program requires personnel with the following training requirements:

### **MSGP** Inspectors

Curricula 10697 ENV-RCRA MSGP Inspector
Item 43337 ENV-CP-QAPP-MSGP
Item 54892 ENV-RCRA-QP-022 MSGP Stormwater Corrective Actions

	Stormwater MSG	P for Industrial	Activities	Program
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Item 42415 ENV-DO-QP-101 Environmental Reporting Requirements for Releases or Events

Item 42547 ENV-DO-QP-111 Reporting Environmental Releases to Pueblo Governments

Item 40708 ENV-DO-QP-108 Preparation of External Correspondence for Review and Approval

Item 43172 ENV-DO-QP-112 Coordinating Regulatory Inspections

Item 42891 ENV-DO-QP-113 Tracking Issues and Actions

Item 43805 ENV-DO-QP-114 Logbook Use and Control

Item 45777 ENV-DO-QP-100 General Field Safety

### Curricula 131 Field Worker Training Requirements

Item 43562 or 3583 or 16585 CPR/AED: LANL Workplace

Item 3574 or 13264 First Aid

### MSGP SWPPP Preparers

Curricula 7814 ENV-RCRA MSGP SWPPP Preparer

Item 43337 ENV-CP-QAPP-MSGP

Item 56593 ENV-RCRA-QP-044 Preparing Storm Water Discharge Monitoring Reports (MDMRs)

for the NPDES Multi-Sector General Permit

Item 40708 ENV-DO-QP-108 External Correspondence

Item 43172 ENV-DO-QP-112 Coordinating Regulatory Inspections

Item 42891 ENV-DO-QP-113 Tracking Issues and Actions

Item 43805 ENV-DO-QP-114 Logbook Use and Control

Item 45777 ENV-DO-QP-100 General Field Safety

### Curricula 51 ENV-RCRA Design Engineer

Item 44269, COE Review of LANL Produced Design Documents, AP-341-620

Item 44266, COE System Design Descriptions, AP-341-61

Item 44263, COE Engineering Drawings and Sketches, AP-341-608

Item 44261, COE Calculation, AP-341-605

Item 44258, COE Requirements and Criteria Document, AP-341-602

Item 44257, COE Functions & Requirements Document, AP-341-601

Item 43658, CORE Engineering Overview

Item 55428, COE Management Level Determination, AP-341-502

Item 54168, P342 Engineering Standards

Item 47029, COE LANL Review of Design by External Agencies, AP-341-622

Item 43666, Engineering Design Management

Item 43663, Engineering Technical Baseline

Item 44225, COE Evaluation of Vendor Information, AP-341-701

### **MSGP** Visual Assessors

### Curricula 10698 ENV-RCRA MSGP Visual Assessor

Item 43337 ENV-RCRA-QAPP-MSGP

Item 50493 ENV-RCRA-QP-064 MSGP Storm Water Visual Assessments

Item 42415 ENV-DO-QP-101 Environmental Reporting Requirements for Releases or Events

Item 42547 ENV-DO-QP-111 Reporting Environmental Releases to Pueblo Governments.

Item 40708 ENV-DO-QP-108 External Correspondence

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Item 43172 ENV-DO-QP-112 Coordinating Regulatory Inspections
Item 42891 ENV-DO-QP-113 Tracking Issues and Actions
Item 43805 ENV-DO-QP-114 Logbook Use and Control
Item 45777 ENV-DO-QP-100 General Field Safety

Curricula 131 Field Worker Training Requirements Item 43562 or 3583 or 16585 CPR/AED: LANL Workplace Item 3574 or 13264 First Aid

### 2.2 MSGP INSPECTOR QUALIFICATIONS

### **Inspections:**

- Post high school education or experience in engineering or environmental science or a related field; or industrial site field experience involving stormwater pollution prevention.
- 2 years experience of completing MSGP inspections or 1 year MSGP inspection experience with the Certified Inspector of Sediment and Erosion Control (CISEC) certification.
- 6 months knowledge of LANL facility operations.
- Demonstrated ability, as determined by the Multi-Sector General Permit Project Lead and/or Water Quality Team Leader, to successfully and effectively evaluate and identify the following at industrial sites:
  - o Conditions and activities that could impact stormwater quality at the facility.
  - o Inadequate or ineffective BMPs.
  - o Required modification or maintenance of existing BMPs.
  - o Locations requiring new or additional BMPs.
  - o Potential pollutant sources associated with the facility.
  - o Appropriate and correct site stabilization measures.
- Demonstrated ability, as determined by the Multi-Sector General Permit Project Lead and/or Water Quality Team Leader, to evaluate the compliance status of each industrial facility and document identified issues during an inspection.
- Demonstrated ability, as determined by the Multi-Sector General Permit Project Lead and/or Water Quality Team Leader, to properly and effectively complete inspection reports, including the ability to perform the following:
  - o Prepare reports in a clear, concise manner, identifying site conditions and issues.
  - o Write legibly and describe conditions clearly and accurately.
  - o Use proper spelling and grammar.
  - o Complete the MSGP Routine Inspection Report forms accurately.
  - o Accurately enter findings into the Corrective Actions Report database.
- Conduct inspections in a professional manner.
- Be a member of, or contractor supporting, ENV-RCRA or ENV Division.

### 2.3 MSGP SWPPP PREPARER QUALIFICATIONS

### **SWPPP** Preparation:

One of the 2 criteria below must be satisfied:

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- BS degree or experience in engineering, environmental science, or related field, with a
  background involving stormwater pollution prevention and regulatory compliance relating to
  MSGP sites and a 1 year minimum of LANL facility operations knowledge and 1 year
  experience of completing MSGP inspections; or
- Certified Professional in Erosion and Sediment Control (CPESC) or Professional Engineer (PE) with a demonstrated background in stormwater management, sediment and erosion control, and regulatory compliance.

### In addition to:

- Demonstrated ability, as determined by the Multi-Sector General Permit Project Lead and/or Water Quality Team Leader, to:
  - Prepare SWPPPs per LANL format and in compliance with NPDES MSGP requirements.
  - o Identify and specify appropriate BMPs and stabilization measures.
  - o Identify potential pollutant sources associated with the facility.
  - o Perform necessary calculations to meet regulatory requirements.
  - o Prepare a site map.
  - o Be a member of, or contractor supporting, ENV-CP or ENV Division.

### 5.4 MSGP VISUAL ASSESSOR QUALIFICATIONS

### **Quarterly Visual Assessments:**

- Education or experience in engineering, environmental science, or a related field; or industrial site field experience involving stormwater pollution prevention; and
- Completed ENV-RCRA training on how to collect and evaluate visual assessment; and
- Demonstrated ability, as determined by the Multi-Sector General Permit Program Lead and/or Water Quality Team Leader, to:
  - o Collect quarterly visual samples at the designated outfall.
  - o Complete the applicable portions of the MSGP Quarterly Visual Assessment Form.
  - Have working knowledge of the regulatory requirements in Section 4.2 of the MSGP.

### 5.5 TRAINING RESPONSIBILITIES

All personnel performing MSGP project-related work are required to obtain appropriate training prior to performing work governed by a procedure. Training for all project personnel will be performed and documented in accordance with ENV-DO-QP-115, *Personnel Training*.

The following table lists specific responsibilities regarding training requirements.

Who	What
Group Leader	Ensure project personnel meet all Laboratory training requirements.
Program Lead	Establish and document job descriptions for each position within the MSGP Project.
	Ensure all project personnel have the appropriate level of education,

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	experience, and training.
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### 3.0 QUALITY IMPROVEMENT

The MSGP Project subscribes to the principles of problem prevention and continuous improvement. The Project Lead is committed to evaluating improvement opportunities identified by trending and reporting.

The Project Lead provides verbal and written updates, as needed, to the Team Leader and Group Leader to keep group management apprised of the focus of the MSGP Project activities and to address any shortcomings that may be identified.

### 3.1 CORRECTIVE ACTIONS WITHIN ENV-RCRA

Corrective actions for all ENV-RCRA programs and projects are initiated, tracked, corrected, and documented according to P330-6 *Nonconformance Reporting*, P322-4 *Laboratory Performance Feedback and Improvement Process*, *SD330*, *Los Alamos National Laboratory Quality Assurance Program*, and Division/Group procedures.

### 3.3 QUALITY IMPROVEMENT RESPONSIBILITIES

The following table lists specific responsibilities for quality improvement:

Who	What
Project Lead	Monitor program performance and ensure issues are corrected in a timely manner.
ENV-CP Staff	Identify opportunities for process improvement, health and safety enhancement, environmental protection, or other improvements of the program's operations.
	Discuss the identified opportunities with the Project Lead.
	Ensure issues are reported and corrected in a timely manner.

### 4.0 DOCUMENT CONTROL/RECORDS MANAGEMENT

The program lead, at least one reviewer, and the Group Leader will approve all revisions to this plan. Revisions to the plan will be provided to the QA Specialist. This plan will be reviewed and revised (if necessary) biennially.

This document will be controlled under the organization's document control system (ENV-DO-QP-106, *Document Control*). Controlled copies of ENV documents are located on the Internet: <a href="http://int.lanl.gov/orgs/env/rcra/qa.shtml">http://int.lanl.gov/orgs/env/rcra/qa.shtml</a>, all other copies are uncontrolled.

Procedures will be developed as necessary and in accordance with ENV-DO-QP-105, *Preparation, Review, and Approval of Procedures*.

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Phone calls, email, or fax communications will be documented and controlled if the content provides direction or results in decisions.

### 4.1 PROGRAM RECORDS

The number, type, and detail of all records to be kept will provide sufficient information to allow an individual with equivalent education and training to verify or reconstruct the results. Implementing procedures specify the records, forms, logbook entries, or other information to be kept as documentation of the performance of the procedure.

Records to be kept in the ENV-CP records system include the following:

- Copy of the Multi-Sector General Permit
- Annual Site Compliance Evaluation reports
- Corrective Action Reports
- Reports and certifications required by MSGP
- Records of all data used to complete MSGP Notice of Intent
- Discharge Monitoring Reports

Records to be kept by the Deployed Environmental Professional assigned to the FOD in which the industrial facility resides includes the following:

- Copies of Stormwater Pollution Prevention Plans
- Reports and certifications required by MSGP
- Routine Inspection Forms
- Supporting analytical data reports including Visual Assessment Forms
- Corrective Action Reports
- Discharge Monitoring Reports
  - Annual Site Compliance Evaluation reports

All ENV-CP records will be maintained and available (after the deadline for submittal as given in applicable procedures) for auditing in the records center at ENV-CP (ENV-DO-QP-110, *Records Management*). Records will be archived in compliance with Laboratory and DOE requirements for records retention, storage, and management.

### 4.2 PROGRAM RECORDS RESPONSIBILITIES

The following table lists specific responsibilities for program records management:

Who	What
Team Leader	Ensure QAPP meets minimum specifications for documentation and records of the SD330, Los Alamos National Laboratory Quality Assurance Program
Program Lead	Conduct annual review of records to ensure compliance with project requirements.

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### 4.3 ELECTRONIC MEDIA

The project will utilize electronic means as necessary to maintain data and perform calculations on these data. Electronic means will not however replace paper copies. All records that must be maintained to meet the requirements of the Permit will be kept in hard copy as the official record.

### 4.4 DATABASES

Analytical data will be maintained in the LANL Water Quality Database (WQDB). Security, verification, and validation of data are maintained in accordance with LANL procedures.

<u>Security</u> -- ENV data will be maintained electronically in a secure manner and will be protected from loss by being maintained as part of an official dataset that is backed up at least weekly.

<u>Verification of data</u> -- All ENV data, either electronic or hardcopy must undergo a verification and validation process that includes the following:

### Verification

- Paper deliverables match electronic data that are stored in an official dataset. Paper deliverables include:
  - chain of custody for sample data
  - field log, if applicable, for sample data
  - data packages for analytical data
  - documentation packages for supporting data (e.g., geographic information system)
- All hand-entered data have been verified by a person other than the individual performing the entry
- Electronic uploads of data (e.g., electronic data deliverables) have been spot checked (at least 10%) to ensure the upload performed as expected
- Hard copy supporting information (e.g., data packages, chains of custody, validation reports, etc.) is evaluated for completeness, archived, and available for audit

<u>Validation</u> --analytical data validation is the responsibility of the EP Directorate. The process will include the following:

- Validate that sample and quality assurance/quality control data and information meet contract specifications
- Assign validation flags, as appropriate
- Identify the analytical supplier
- Identify the analytical method

<u>Verification of calculations</u> -- A person other than the person who generated the query will review for accuracy all compliance related calculations performed in a database through queries. This review will be documented and forwarded to the appropriate record series.

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### **Spreadsheets:**

<u>Backups</u> -- All spreadsheets used to hold data and generate reports to be used in demonstrating compliance will be maintained in a secure location. The preferred location is on the Group server. Spreadsheets will be backed up at least weekly.

<u>Verification of data</u> -- All compliance-related data uploaded into a spreadsheet will be verified to be accurate against the original paper copy. Data that are uploaded through electronic means will undergo a 10% verification. Data that are uploaded through manual means will undergo a 100% verification. Someone other than the data entry person must perform the 100% review. This review will be documented and forwarded to the appropriate record series.

<u>Verification of calculations</u> -- A person other than the person who generated the spreadsheet will review for accuracy all compliance-related calculations performed in a spreadsheet. This review will be documented and forwarded to the appropriate record series. Modifications to the function of these spreadsheets will also be verified in this manner.

<u>Software control</u> -- The integrity of spreadsheets will be ensured by limiting access to these spreadsheets to only trained, authorized personnel. Additionally, at least once per year, the function of the spreadsheets will be verified by hand calculations. Documentation of this review will be forwarded to the appropriate record series.

### 4.4 IMPLEMENTATION RESPONSIBILITIES

The following table lists specific responsibilities:

Who	What
Program Lead	Regularly assess data integrity methods used by MSGP personnel.

### 5.0 PLANNING AND PERFORMING WORK

Work conducted under this program ensures compliance with the 2008 Multi-Sector General Permit; the Clean Water Act; and DOE Orders 450.1, *Environmental Protection Program*, and 5400.5, *Radiation Protection of the Public and Environment*.

Work that contributes to achieving the quality specifications of the MSGP deliverables will be planned and documented as described in this document and implementing procedures.

Work will be performed according to applicable plans and implementing procedures. The team leader will provide first line supervision of personnel assigned to project tasks to ensure work is performed to achieve project quality specifications. Before changing a work process that affects the project quality specifications, the team leader will ensure the same level of planning and review as used in the initial project planning steps.

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### 5.1 WORK PROCESSES

All work should be regarded as a process. Each process consists of a series of actions and is planned and carried out by qualified workers using specified work processes and equipment under administrative, technical, and environmental controls established by management to achieve an end result. Workers are the best resource of contributing ideas for improving work processes and will be involved in work process design, process evaluation, and providing the feedback necessary for improvement.

All work is planned and performed using the principles of Integrated Safety Management and in compliance with P300, *Integrated Work Management for Work Activities*.

### 5.3 WORK PERFORMANCE

Management should ensure that the following are clearly identified and conveyed to workers prior to beginning work:

- customer and data requirements for the work and final product;
- acceptance criteria applicable to work and final product;
- hazards associated with the work;
- technical standards applicable to work and final product; and
- safety, administrative, technical, and environmental controls to be employed during the work.

The work processes used to meet the regulatory requirements and the requirements of this plan can be divided as follows:

- Stormwater Pollution Prevention Plans (Multi-Sector General Permit Section 5.0)
- Inspections (Multi-Sector General Permit Section 4.0)
- Monitoring (Multi-Sector General Permit Section 6.0)
- Discharge Monitoring Reports (Multi-Sector General Permit Section 7.1 Reporting Monitoring Data to EPA)
- Best Management Practices (Multi-Sector General Permit Section 2.0 –Control Measures)
  - Reporting and Recordkeeping (Multi-Sector General Permit Section 7.0)

### 5.4 STORMWATER POLLUTION PREVENTION PLAN

Stormwater Pollution Prevention Plan (SWPPP) development and implementation by the regulated industrial facility is required for MSGP compliance (refer to Section 8.0 of the 2008 MSGP for Sector-Specific Requirements for Industrial Activity and Appendix D, Sectors of Industrial Activity Covered by This Permit). The SWPPP is intended to document the selection, design, and installation of control measures. Additional documentation requirements are intended to document the implementation (including inspection, maintenance, monitoring, and corrective

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action) requirements identified in the 2008 MSGP permit. The SWPPP is a written assessment of potential sources of pollutants in stormwater runoff and control measures that will be implemented at the specific industrial facility to minimize the discharge of pollutants in runoff from the site. These control measures include site-specific Best Management Practices (BMPs), inspections, employee training, and reporting. The procedures detailed in the SWPPP must be implemented by the facility and updated as necessary, with a copy of the SWPPP kept on-site.

The SWPPP development process involves evaluating regulated industrial activities and requiring Facility Management support in implementation, improvement, and revision of the Plans.

### 5.4.1 DISCHARGE MONITORING REPORTS

The Laboratory is required to submit analytical results of stormwater monitoring and to keep the results with the facility specific SWPPP. The Laboratory must certify and submit analytical monitoring results obtained from each facility specific sampling location (i.e., the sampling station located at the monitored outfalls) associated with industrial activity on a Discharge Monitoring Report (DMR) form or use it to report any of the following:

- no discharge for all outfalls for a specific monitoring period;
- the industrial facility status has changed to inactive and unstaffed;
- the facility status has changed to active; or
- no further pollutant reductions are achievable for all outfalls and for all pollutants (see Section 6.2.1.2 of the 2008 MSGP).

### 5.4.2 ANNUAL SITE COMPLIANCE EVALUATION REPORT

The Laboratory is required to submit an annual report (Attachment 2) to the Environmental Protection Agency (EPA) that includes the findings from the comprehensive site inspection and any corrective action documentation. The documentation must include the following:

- identification of the condition triggering the need for corrective action review;
- date and description of the problem identified;
- summary of the corrective action taken or to be taken;
- notice of whether SWPPP modifications are required as a result of the discovery or corrective action;
- date corrective action was initiated; and
- date corrective action was completed or is expected to be completed.

The following table lists responsibilities:

Who	What
Project Lead	Ensure that SWPPP requirements are performed in accordance with the MSGP.

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Facility Management Support	Implement SWPPP requirements as recommended by the Project
	Lead.
ENV-CP Staff and Deployed	Assure SWPPP implementation as required by MSGP.
Environmental Professionals	
(DEPs)	
DEPs	Develop, modify, and update SWPPPs and assist facility personnel with SWPPP implementation.

### 5.5 Inspections

The MSGP requires periodic inspection of industrial processes and maintenance of (BMPs) to assure effectiveness of control measures. The Laboratory has implemented a quarterly or monthly inspection process (depending on the industrial facility) to support this determination. A copy of the Routine Inspection Form is provided in Attachment 3.

### 5.6 STORMWATER MONITORING

Benchmark stormwater monitoring is the required mechanism for determining the effectiveness of corrective actions and meeting the requirements of the MSGP. Refer to Attachment 4, *MSGP Facilities and Stormwater Monitored Outfalls Associated with Industrial Activity 2011*, for a list of Laboratory sites that have monitoring requirements. Laboratory management has made an investment in time and materials, in addition to a commitment to comply with the 2008 MSGP Permit. All stormwater monitoring is conducted by ENV-CRP personnel. The MSGP Project currently has a network of 23 monitoring stations. Considerations to be used for MSGP stormwater monitoring development decisions will include MSGP requirements, new state water quality standards, Administrative Authority requests, or new permit requirements. Stormwater monitoring will be conducted as specified in the MSGP.

Effluent Limitations stormwater monitoring is required for the following type of facility of LANL:

Regulated	Parameter	Effluent	Monitoring	Sample Type
Activity		Limit	Frequency	
Discharges from asphalt emulsion facilities	Total Suspended Solids	23.0 mg/L daily max. 15.0 mg/L, 30-day avg.	1/year	grab
	pН	6.0-9.0 s.u.	1/year	grab
	Oil and Grease	10.0 mg/L 30-day avg.	1/year	grab

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This determination was made in accordance with Section 1.1.2.4 of the MSGP. The TA-60 Asphalt Batch Plant meets the criteria for effluent limitations monitoring in this section. Exceedances of the effluent limits in this table require immediate action. In addition, if follow-up monitoring after corrective actions also exceeds an effluent limit guideline, an Exceedance Report for Numeric Effluent Limits must be submitted to EPA no later than 30 days after lab results have been received and verified.

Impaired Waters stormwater monitoring is required for discharges made to an impaired water. The canyons within and surrounding Los Alamos National Laboratory are declared as Impaired Waters by the New Mexico Environment Department. The pollutants vary from canyon to canyon and are listed in Attachment 5, *Pollutants Under Impaired Waters Monitoring*. The pollutants may be discontinued in subsequent annual monitoring if the concentration is below background levels in stormwater or if the constituent is not detected.

Visual assessments are also required by the MSGP and are an important tool for collecting information to determine the effectiveness of controls in preventing potential contaminants from migrating off Laboratory property. Accordingly, field personnel must conduct visual assessments for stormwater collected at the monitoring stations or discharged through substantially identical outfalls associated with industrial facilities located throughout the Laboratory. Information recorded will document all observations that are required by the MSGP (see ENV-RCRA-QP-064, *Multi-Sector General Permit Storm Water Visual Inspections*).

The Laboratory's MSGP permit requires stormwater quality monitoring to evaluate compliance with water quality standards and evaluation against benchmarks. Parameters sampled at the monitoring stations are selected based on permit requirements and the results of the previous year.

Four stormwater samples per year are required under the 2008 MSGP, but it is not necessary to collect them in consecutive quarters if climatic conditions that prevented quarterly collection are documented (see *Adverse Weather Conditions* in Section 6.1.5 of the MSGP). Sample locations are listed in Attachment 4, *MSGP Facilities and Stormwater Monitored Outfalls Associated with Industrial Activity 2011*, and collection will be conducted in accordance with LANL and NPDES Permit requirements and the current year MSGP Sampling and Analysis Plan.

Stormwater samples are used to demonstrate compliance with water quality standards and requirements to evaluate results against benchmark parameters (Attachments 5 and 6). Any persons involved in the preparation, retrieval, and analysis must maintain positive control of samples at all times until sample disposal. ENV-RCRA personnel will follow guidance in the Associate Directorate for Environmental Programs (ADEP) document ENV-WQH-QP-029, *Creating and Maintaining a Chain of Custody*, as well as, ENV-RCRA-QP-047, *Inspecting Storm Water Runoff Samplers and Retrieving Samples*, and ENV-RCRA-QP-048, *Processing MSGP Storm Water Samples*.

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### Chain of custody is maintained during:

Activity	Responsibility
Sample collection and preparation	All persons (other than analytical personnel) performing sample preparation and collection will be trained to sample collection procedures and must adhere to the chain of custody requirements therein.
Analysis	Analytical laboratories performing sample analysis will maintain sufficient procedures to ensure positive control of samples as specified in the existing Statement of Work.
Storage/ disposal	Analytical laboratories will maintain retained samples and/or sample portions under chain of custody until reanalysis, or ultimate disposal.

The LANL Sample Management Office (SMO) will be the central point for all analytical laboratory selection, evaluations, sample submittal, and data return. The SMO will evaluate potential analytical laboratories, prepare analytical statements of work that include requirements, and arrange contracts with selected laboratories for analysis of all samples. The SMO will accept samples from field collection personnel, process the sample, ship the samples to the off-site analytical laboratories, and receive the data packages from the laboratories.

All analytical data will be received from analytical laboratories in electronic format and uploaded into a database. All received data will be checked for completeness and adherence to contract requirements. After uploading, all data will undergo verification and validation (V&V) for evidence of laboratory contamination, improper analytical method, and other analytical issues which could potentially affect data quality.

Field data collected by sample collection personnel will be verified and validated by the SMO when field personnel deliver samples to the SMO.

If significant V&V issues are identified, results will be forwarded to and discussed with the responsible project leads.

Data issues that result from procedural failures, personnel errors, or other failures to follow requirements will be documented as issues and corrected according to ENV-DO-QP-113, *Tracking Issues and Actions*.

The following table lists responsibilities:

Who	What
Project Lead	Ensure that all project monitoring requirements are performed in accordance with the MSGP.
	Review and update the MSGP Sampling and Analysis Plan annually.

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	When complete, communicate findings to the team members for implementation. Make appropriate arrangements with the SMO to accept, process, and submit samples to an analytical laboratory for required analyses as specified in the SAP.
MSGP Water Quality Compliance Personnel	<ul> <li>Implement monitoring program as required by the MSGP Project Lead.</li> <li>Conduct stormwater sampling in accordance with the MSGP Sampling and Analysis Plan and applicable procedures.</li> <li>Ensure procedures for sample handling and control during sample preparation and retrieval are followed.</li> </ul>
Sample Management Office	<ul> <li>Develop Statements of Work (SOW) for all analytical laboratories that perform analytical work for the MSGP project in accordance with P840-1, Procurement Quality.</li> <li>Ensure analytical laboratories comply with the DOE's SOW. Conduct an annual audit of the laboratory to ensure compliance with the SOW.</li> <li>Approve Statements of Work for analytical laboratories that are contracted to analyze water samples.</li> <li>Approve analytical laboratories that are contracted to analyze water samples for regulatory compliance purposes.</li> <li>Accept samples and submit them to and approved analytical laboratory for analysis.</li> <li>Track progress of samples at the analytical laboratory and resolve issues with sample analysis.</li> <li>Receive data packages from the analytical laboratory and enter data into the database.</li> <li>Provide the MSGP Project Lead with monthly invoice updates.</li> <li>Perform V&amp;V of field data submitted and uploaded from forms when samples are submitted to the SMO.</li> </ul>
Operations Integration Office (OIO), Systems Integration (SI)	Perform V&V of data packages uploaded by the SMO or send data packages to a subcontractor company for independent V&V.

### 5.7 DISCHARGE MONITORING REPORTS

The Laboratory is required to submit analytical results of stormwater monitoring and to keep the results with the specific SWPPP. The Laboratory must submit analytical monitoring results obtained from each monitoring station associated with industrial activity on a MSGP Discharge Monitoring Report (MDMR) form (one form must be submitted for each storm event from which, a sample was collected).

MDMRs shall be written in accordance with ENV-RCRA-QP-044, *Preparing Storm Water Discharge Monitoring Reports (MDMRs) for the NPDES Multi-Sector General Permit.*MDMRs shall be submitted to EPA within 30 calendar days of receiving validated

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analytical results. Refer to the DMR language under the SWPPP Section above for additional requirements.

Site analytical requirements are defined by the industrial activity in the MSGP permit. All MSGP analytes applicable to LANL are consistent with the requirements of 40 CFR Part 136, *Guidelines Establishing Test Procedures for the Analysis of Pollutants*.

Sample analytical requirements vary by site depending on the industrial activities performed at the site. Refer to Attachment 5 for a list of analytes by industrial sector. If an insufficient quantity of sample is available, then sample collection will be prioritized at that location for future events. Additional samples may be collected to meet permit requirements.

ENV-RCRA shall refer to the requirements of the 2008 Multi-Sector General Permit, and the most current MSGP Sampling and Analysis Plan to determine the priorities of required analyses.

The following table lists responsibilities:

Who	What
Project Lead	<ul> <li>Ensure implementing procedures for sample analyses are used.</li> <li>Ensure that MDMRs are submitted to EPA and NMED in accordance with the MSGP.</li> </ul>
MSGP Water Quality Compliance Personnel	Assure MDMRs are completed and certified as required by the MSGP and have received a full quality assurance review.

# 5.8 ADVERSE WEATHER CONDITIONS AND CLIMATES WITH IRREGULAR STORMWATER RUNOFF

Section 4.2.3 of the 2008 MSGP allows the industrial facility to take a substitute sample during the next qualifying storm event when adverse weather conditions prevent the collection of samples during a specific quarter. Adverse weather conditions are those that are dangerous or create inaccessibility for personnel, such as local flooding, high winds, or electrical storms, or situations that otherwise make sampling impractical, such as drought or extended frozen conditions. Documentation of the rationale for no visual assessment for the quarter must be included in the facility specific SWPPP.

Since LANL is located in an area where limited rainfall occurs during parts of the year (i.e., in a semi-arid climate) and has periods of freezing conditions, LANL has identified an alternative monitoring period of four quarters as follows for each calendar year.

April 1-May 31

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- June 1-July 31
- August 1-September 30
- October 1-November 30

The following table lists specific responsibilities.

Who	What
Project Lead	Ensure that the monitoring schedule is documented in facility specific SWPPPs and provided to EPA on the MDMRs.

### 5.9 REPORTING AND RECORDKEEPING

All monitoring data shall be collected in accordance with the requirements specified in the 2008 MSGP. LANL will submit monitoring results to EPA within 30 days of receiving validated laboratory results. The address for submittal of monitoring results is as follows.

U.S. Environmental Protection Agency Office of Water, Water Permits Division Mail Code 4203M, ATTN: MSGP Reports 1200 Pennsylvania Avenue, NW Washington, D.C. 20460

LANL shall keep copies of the following documentation for a period of at least 3 years from the date that LANL's coverage under the MSGP expires or is terminated.

- SWPPP (including any modifications made during the term of the 2008 MSGP)
- Additional documentation requirements as identified in Section 5.4 of the MSGP
- All reports and certifications required by the MSGP
- Monitoring data
- Records of all data used to complete the NOI.

The following table lists specific responsibilities:

Who	What
Project Lead	Periodically audit MSGP records to ensure documentation of compliance is being retained.
Deployed Environmental Professionals	Retain records as required by the MSGP for industrial facilities located in their FOD.

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### 5.10 BEST MANAGEMENT PRACTICES

It is critical that the Laboratory be able to effectively inspect and maintain the Best Management Practices that have been installed at various locations. Quarterly inspections must be completed and provided to the Project Lead for inclusion into the records system. In addition, the Project Leader conducts a Comprehensive Annual Site Inspection and writes a report to document the status of BMPs and other identified corrective actions. This report is sent to EPA each year. Laboratory management has made an investment in time and materials, in addition to a commitment to minimizing the potential migration of contaminants in stormwater. Report findings are evaluated and in conjunction with facility personnel, BMPs are modified, installed, or removed as necessary.

The following table lists responsibilities.

Who	What	
Project Lead	Assist facility personnel and Deployed Environmental Professionals with implementation, inspection, and maintenance of BMPs at MSGP facilities.	
Facility Management Support	<ul> <li>Coordinate with Project Lead and provide funding as needed to install, inspect, maintain and implement identified BMPs.</li> <li>Certify the corrective actions identified by the Project Lead and/or facility personnel (or their representatives) for their individual facilities in the Annual Report.</li> </ul>	

### 5.11 INFORMATION MANAGEMENT

The Water Quality Database is a database information system designed in part to support the information management (IM) needs of the Laboratory's MSGP. MSGP support includes stormwater discharge monitoring reporting, Geographic Information System (GIS) development, and other IM activities as needed.

The following table lists responsibilities:

Who	What
Project Lead	Coordinate with IM support personnel to meet regulatory requirements.

### 5.12 RESPONDING TO WATER QUALITY EXCEEDANCES

The identification of a pollutant source(s) contributing to a water quality exceedance will be addressed through the creation of a corrective action that is entered into the Corrective Acton

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Report database in accordance with ENV-DO-QP-113, *Tracking Performance Feedback and Actions* and *ENV-RCRA-QP-022*, *MSGP Stormwater Corrective Actions*. Federal stormwater regulations implemented under the Laboratory's MSGP (40 CFR 122, EPA Administered Permit Programs: The National Pollutant Discharge Elimination System) require that corrective action be taken if exceedances of water quality standards or MSGP numeric effluent limits are identified. Corrective actions are typically accomplished by modifying, as appropriate, existing BMPs and SWPPPs.

When a water quality exceedance occurs, the Laboratory will submit the data on the required MDMRs, investigate the occurrence, and document corrective actions.

When an exceedance of the MSGP benchmark parameters is detected, the Project Lead will assure the analytical data is reviewed, notify appropriate SWPPP owners, and recommend and track corrective actions where required.

The following steps lead to corrective actions:

STEP	Action
1	Establish that an analytical result from a location is valid and has exceeded a standard or MSGP benchmark.
2	Evaluate and demonstrate that the analyte is of LANL origin, if possible.
3	Determine the source and assign responsibility for the corrective action.
4	Develop a corrective action plan.

The following table lists responsibilities:

Who	What
Project Lead	<ul> <li>Assure that analytical data is reviewed and accurate.</li> <li>Notify appropriate SWPPP owners, Laboratory management, and Deployed Environmental Professionals.</li> <li>Develop a corrective action plan.</li> <li>Follow up with corrective actions if required.</li> <li>Track corrective actions.</li> </ul>
Facility Management and DEP	<ul> <li>Review analytical data with Project Lead and provide input into a possible corrective action necessary to improve water quality where needed.</li> <li>Evaluate and improve BMPs in accordance with site conditions, industry standards, and manufacturer</li> </ul>

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recommendations.
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### 5.13 Instrumentation and Equipment

Compliance will be tracked by performing inspections of samplers and other associated equipment, inspecting BMPs, and conducting annual site compliance evaluations. Adequate records will be maintained to demonstrate the operating history of essential instrumentation and equipment.

LANL will properly operate and maintain all systems of monitoring and control and related appurtenances which are installed or used to achieve compliance with the MSGP and the SWPPP. Backup instrumentation and equipment will be timely deployed in the event of equipment failure.

Instrument calibration is essential for documenting the quality of data obtained with the instrument. All technical work that depends upon the accuracy of data will be performed using equipment for which the calibration status and limits of accuracy are known and controlled.

Field team personnel will calibrate and perform maintenance procedures on all monitoring and analytical field instruments to ensure accuracy of measurements and will maintain appropriate records of such activities. All field calibrations will be documented as prescribed by procedures or manufacturer's instructions.

The following table lists specific responsibilities.

Who	What		
Project Lead	Ensure data are collected and equipment is operated and maintained in accordance with project requirements.		
	Provide equipment maintenance and calibration specifications and ensure MSGP Water Quality Compliance Team personnel operate and conduct field activities in accordance with implementing procedures and specific work orders.		

### 6.0 DESIGN

Design activities will be conducted and reviewed in accordance with PD340, *Conduct of Engineering* and P341, *Engineering Process Manual*.

Design standards under this program include, but are not limited to temporary and permanent BMPs, corrective action measures, and stormwater monitoring support.

Design inputs will be specified and approved on a timely basis for making design decisions. Inputs will contain the level of detail required to permit the performance of design activities correctly.

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Formal design reviews, including design verifications and evaluation of design changes, will be conducted to ensure that the design input is correctly incorporated into the design output. Changes to design will undergo the same review as the original design.

Verification and validation of the adequacy of designs are conducted before relying on the performance of the design function. Verification and validation are conducted in accordance with implementing procedures.

The following table lists responsibilities.

Who	What
Project Lead	<ul> <li>Provide input to the design process in accordance with appropriate standards, requirements, and implementing procedures.</li> </ul>
	<ul> <li>Determine the qualifications required to perform a review of design documents.</li> </ul>
	<ul> <li>Identify a resource with skills, knowledge, ability, training, and certifications required to complete the review of the facility engineering design documents.</li> </ul>
	Communicate the results of the review to the requestor.
ENV-CP Staff	Review design documents and requests as assigned.
	Inform the Project Lead of concerns regarding the facility engineering designs.

### 7.0 PROCUREMENT

Items and services required for this process are commercial grade in nature and no special procurement requirements or needs are necessary. All procurements will be made in accordance with P840-1, *Procurement Quality*. For items and all services for which special requirements are necessary, the Project Lead and project members will identify such items or services.

The following table lists responsibilities:

Who	What
Group Leader	Ensure all procurements are conducted in accordance with P840-1.
Project Lead	Recommend to Group Leader contracting items and services.  Develop acceptance criteria.
ENV-CP Staff	Identify potential suppliers of products or services necessary to complete work activities that must be procured from outside ENV-RCRA.

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### 8.0 INSPECTION AND ACCEPTANCE TESTING

Any materials or services will be inspected and/or tested prior to acceptance for use in this project in accordance with P330-8, *Inspection and Test for Acceptance*. Most supplies used during performance of project activities are commercial grade in nature and require no special acceptance practices or procedures.

The following table lists responsibilities:

Who	What
Group Leader	Ensure procedures for inspection meet SD330, Los Alamos National Laboratory Quality Assurance Program requirements.
Project Lead	Verify that all materials and services meet acceptance criteria.
ENV-CP Staff	Follow established procedures for inspection and acceptance testing.

### 9.0 MANAGEMENT ASSESSMENT

The ENV-CP Group conducts internal management assessments of projects and programs in accordance with the requirements in P328-3, *Management Assessment* and P328-4, *Management Observation and Verification*. Assessments of the program are documented and filed as records.

When violations of requirements are found during a management assessment, a nonconformance report is initiated in accordance with P330-6, *Nonconformance Reporting* for nonconforming items.

Nonconforming services or processes are tracked and documented in accordance with P322-4, *Issues and Corrective Action Management*.

The following table lists responsibilities:

Who	What
Group Leader	Ensure management self-assessments for the MSGP program are conducted as specified in implementing procedures.
Project Lead	Ensure program management self-assessments are conducted.

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### 10.0 INDEPENDENT ASSESSMENT

Independent assessments are those assessments conducted by organizations external to ENV-RCRA. As required by the SD330, *Los Alamos National Laboratory Quality Assurance Program*, this program may be assessed by outside organizations in accordance with P328-2, *Independent Assessment*.

Periodically audits/assessments will be conducted, with input from the Project Lead identifying one or more areas of the project to be audited.

The following table lists responsibilities:

Who	What
Project Lead	Approve audit schedules.
	Provide input to the QA Specialist as to the content of audit.
	<ul> <li>Review audit reports for factual accuracy. Address all findings and implement corrective actions as appropriate.</li> </ul>
QA Specialist	Identify areas to be addressed during internal audits.
	<ul> <li>Contract with the Quality Management Group to perform annual internal audits.</li> </ul>
	<ul> <li>Review audit procedures to ensure they meet the requirements in this section.</li> </ul>
Team Members	Cooperate with auditors by providing information, data, etc.
	Implement corrective actions as directed by the Project Lead.

### 11.0 ATTACHMENTS

Attachment 1- MSGP Program Organization

Attachment 2 – Annual Reporting Form

Attachment 3 – Routine Inspection Form

Attachment 4 – MSGP Facilities and Storm Water Monitored Outfalls Associated with Industrial Activity 2011, Permit NMR05GB21

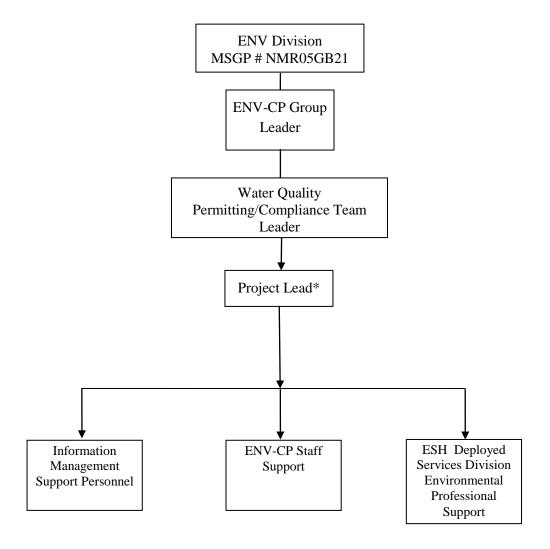
Attachment 5 – Pollutants under Impaired Waters Monitoring

Attachment 6 – Analytes by Industrial Sector

Attachment 7 – References and Guidance Documents

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#### **ATTACHMENT 1- MSGP PROGRAM ORGANIZATION**



<sup>\*</sup>Project Lead acts as liaison and will work directly with Team Leaders for staff assignments.

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#### ATTACHMENT 2 – ANNUAL REPORTING FORM

	NPDES Permit Tracking No.:
United States Environmental Protection Agency Washington, DC 20460	
Annual Reporting Form	
A. GENERAL INFORMATION	
1. Facility Name:	
2. NPDES Permit Tracking No.:	
3. Facility Physical Address:	
a. Street:	
b. City: c. State: d. Zip Code:	·
4. Lead Inspectors Name: Title: Title:	
Additional Inspectors Name(s):	
5. Contact Person: Title:	
Phone: Ext E-mail: E-mail:	
6. Inspection Date: / / / / / / / / / / / / / / / / / / /	
B. GENERAL INSPECTION FINDINGS	
1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may $\square$ YES $\square$ NO	be exposed to stormwater?
If NO, describe why not:	
NOTE: Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B. may be exposed to stormwater.	2 or B.3 below where pollutants
2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP?	
If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures.	res in place:

	NPDES Permit Tracking No.
. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? 🔲 YE	S NO
If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any cor	ntrol measures in place:
Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots?	NA, no monitoring performed
If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:	
. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around o	utfalls including flow
dissipation measures to prevent scouring:	ottails, motoding new
Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submis authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this permit is permit if this is your first annual report), including any corrective actions identified as a result of the permit is permit if this is your first annual report).	ssion (or since you received his annual comprehensive site
If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions?	
IOTE: Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a	result of this comprehensive

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			NPD	ES Pe	rmit T	rackir	ng No.:
					Ш		
C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS						-	
Complete one block for each industrial activity area where pollutants may	be expose	d to stormwater. Copy this page for addition	nal ind	ustrio	l activ	vity e	rose
In reviewing each area, you should consider:  Industrial materials, residue, or trash that may have or could come ir  Leaks or spills from industrial equipment, drums, tanks, and other co  Offsite tracking of industrial or waste materials from areas of no expe  Tracking or blowing of raw, final, or waste materials from areas of no	nto contact ontainers;	with stormwater;	iai iiiu	ustria	aun	nty ar	eas.
INDUSTRIAL ACTIVITY AREA:		·					
1. Brief Description:							
Are any control measures in need of maintenance or repair?	☐ YES	□NO					
Have any control measures failed and require replacement?							
Are any additional/revised control measures necessary in this area?	☐ YES	□ NO					
If YES to any of these three questions, provide a description of the problem:  Corrective Action Form)		_	the at	tached	ı		
INDUSTRIAL ACTIVITY AREA:  1. Brief Description:							
Are any control measures in need of maintenance or repair?     Have any control measures failed and require replacement?	☐ YES	□ NO					
Are any additional/revised c necessary in this area?	YES	□ NO					
If YES to any of these three questions, provide a description of the problem: Corrective Action Form)			n the at	tached	i		
INDUSTRIAL ACTIVITY AREA:							
Brief Description:							
Are any control measures in need of maintenance or repair?	☐ YES	□ NO					
3. Have any control measures failed and require replacement?	☐ YES	□NO					
4. Are any additional/revised BMPs necessary in this area?	☐ YES	□ NO					
If YES to any of these three questions, provide a description of the problem: Corrective Action Form)	(Any neces	ssary corrective actions should be described on	the att	ached			

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			NPDE	S Perr	nit Tra	cking	No.:
			Ш	Ш		Ш	
		NOTE: Copy this page and attach	addition	nal pag	es as	neces	sary
INDUSTRIAL ACTIVITY AREA:							
1. Brief Description:							
2. Are any control measures in need of maintenance or repair?	☐ YES	□NO					
3. Have any control measures failed and require replacement?	☐ YES	□NO					
4. Are any additional/revised BMPs necessary in this area?	☐ YES	□NO					
If YES to any of these three questions, provide a description of the Corrective Action Form)	he problem:	(Any necessary corrective actions should be described on the	e attacl	hed			
Corrective Action Form)							
INDUSTRIAL ACTIVITY AREA:							
1. Brief Description:							
1. Diei Description.							
Are any control measures in need of maintenance or repair?	☐ YES	□NO					
Have any control measures failed and require replacement?	YES	□NO					
Are any additional/revised BMPs necessary in this area?	☐ YES	□NO					
If YES to any of these three questions, provide a description of the	he problem:	(Any necessary corrective actions should be described on the	e attac	hed			
Corrective Action Form)							
INDUSTRIAL ACTIVITY AREA:							
1. Brief Description:							
	E V50	FINO					
Are any control measures in need of maintenance or repair?      Have any control measures foiled and require replacement?	☐ YES	□ NO					
Have any control measures failed and require replacement?      Are any additional/revised BMPs necessary in this area?	☐ YES	□ NO					
If YES to any of these three questions, provide a description of the			e attac	hed			
Corrective Action Form)	problem.	Viny increased y consented actions enough to accompany of the					

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	NPDE	S Permit	Tracki	ıg No.:
	Ш			
D. CORRECTIVE ACTIONS				
Complete this page for each specific condition requiring a corrective action or a review determining that no corrective at page for additional corrective actions or reviews.	tion is ne	eded. C	Copy th	is
Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions ned identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been previous annual report.	ded to ad complete	dress pro	oblems time of	your
1. Corrective Action # of for this reporting period.				
2. Is this corrective action:				
☐ An update on a corrective action from a previous annual report; or				
☐ A new corrective action?				
3. Identify the condition(s) triggering the need for this review:				
☐ Unauthorized release or discharge				
☐ Numeric effluent limitation exceedance				
☐ Control measures inadequate to meet applicable water quality standards				
☐ Control measures inadequate to meet non-numeric effluent limitations				
☐ Control measures not properly operated or maintained				
☐ Change in facility operations necessitated change in control measures				
☐ Average benchmark value exceedance				
Other (describe):				
4. Briefly describe the nature of the problem identified:				
5. Date problem identified:				
6. How problem was identified:				
☐ Comprehensive site inspection				
☐ Quarterly visual assessment				
☐ Routine facility inspection				
☐ Benchmark monitoring				
□ Notification by EPA or State or local authorities				
Other (describe):				
7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modification measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:	s or repair	s to cont	trol	
8. Did/will this corrective action require modification of your SWPPP?				
9. Date corrective action initiated:				
10. Date correction action completed:	Ш			
11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection an (including timeframes associated with each step) necessary to complete corrective action:	d describe	any ren	naining	steps

N I	IPDES Permit Tracking No.:
E. ANNUAL REPORT CERTIFICATION	
1. Compliance Certification	
Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of the your knowledge, you are in compliance with the permit?   YES  NO	nis inspection, to the best of
If NO, summarize why you are not in compliance with the permit:	
2. Annual Report Certification	
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance wassure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persustem, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge	sons who manage the and belief, true, accurate,
and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and impriviolations.	isonment for knowing
Authorized Representative	
Printed Name:	
Signature: Date Signed:	

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#### ATTACHMENT 3 – ROUTINE INSPECTION FORM

Name of Facility:				Resnons	ible FOD (Name & Organizatio	n)·
					•	
Qualified Inspector(s): Others Present:			Inspection type:   Quarterly   Other		Date of inspection (MM/DD/YYYY):	
Others Present:						Time of inspection:
Weather: □ Clear □Cloudy □ F Temperature: ° F	Rain 🗖 S	leet 🛭 Fog	□s	now 🗖 l	ligh Winds  ☐ Other: Is Inspection Being Con	ducted During a Storm Water Discharge? □Yes □No
# Structural Control Measures (BMP)s	Location	Operating Effectively (Yes or No)?	Maint Repa	Need to ain (M), ir (R) or ce (RP)?	Corrective Action Needed ar failed control measures that ne	nd Notes (identify needed maintenance and repairs, or any eed replacement)
1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11.						
Were additional BMPs or Control Mea						
Were previously identified conditions	s corrected		xt antic	ipated stor	m event? □ Yes □ No If No, o	describe reason:
Area/Activity (Areas of Industrial Materials or Activities Exposed to Storm Water)	Inspected ?	Controls Adequate?	Corre	ctive Actio	n Needed and Notes (List area	letter with comments below)
Material loading/unloading & storage areas     Equipment operations & maintenance areas     C. Fueling Areas     Outdoor vehicle & equipment washing areas     Waste Handling & disposal areas     F. Erodible areas / construction     G. Non-storm water / illicit						

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Н.	Salt storage piles or pile						
I.	containing salt  Dust generation & vehicle tracking						
Are the SWPP Plan maintenance, schedules and procedures being implemented at the facility? □ Yes □ No							
Were any Corrective Actions initiated or completed? □ Yes □ No Describe:							
Are there any conditions requiring Corrective Action?   Yes  No If Yes, List Number of Corrective Actions Required (Note – You need enter a Corrective Action in the MSGP Corrective Action Report database for each listed)							

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### ATTACHMENT 4 -- MSGP FACILITIES AND STORM WATER MONITORED OUTFALLS ASSOCIATED WITH INDUSTRIAL ACTIVITY 2011, PERMIT NMR05GB21

Location	Permitted Facility	Operation	Activity	Sector	Monitored Outfall	• Canyon
TA-15-185	TA-15-185 PHERMEX	Vehicle Maintenance Shop	Vehicle Maintenance	Р	15-PHRMX- 1	• Water
TA-3-0034	TA-3-0034 Metal Shop	Fabricated Metals	Fabricated Metals	AA	3-MST-1	<ul> <li>Mortandad</li> </ul>
TA-3-22	TA-3-22 Power & Steam Plant	Power Plant	Steam Electric Power	0	3-PSP-1 3-PSP-5 3-PSP-8	<ul><li>Sandia</li><li></li></ul>
TA-3-38	TA-3-38 Metals Fab Shop	Metal Shop	Fabricated Metals	AA	3-MFS-1	• Sandia
TA-3-39	TA-3-39 & 102 Metal Shop	Metal Shop	Fabricated Metals	AA	3-TS-1	<ul> <li>Pajarito</li> </ul>
TA-3-66	TA-3-66 Sigma Complex	Sigma Foundry	Primary Metals	F	3-Sigma-6	• Sandia
TA-54	TA-54 Area G	Area G - South Side	TSD	K	54-G-1	<ul> <li>Pajarito</li> </ul>
TA-54	TA-54 Area G	Area G -North Side	TSD	К	54-G-2	<ul> <li>Canada del Buey</li> </ul>
TA-54	TA-54 Area G	Area G - South Side	TSD	K	54-G-3	<ul> <li>Pajarito</li> </ul>
TA-54	TA-54 Area G	Area G - South Side	TSD	K	54-G-4	<ul> <li>Pajarito</li> </ul>
TA-54	TA-54 Area L	Area L	TSD	К	54-L-1	<ul><li>Canada del Buey</li></ul>
TA-54-38	TA-54 RANT	RANT	TSD	К	54-RANT-1	<ul> <li>Canada del Buey</li> </ul>
TA-60	TA-60 Asphalt Batch Plant	Asphalt Batch Plant	Asphalt Paving	D	60-ABP-1	<ul> <li>Mortandad</li> </ul>
TA-60	TA-60 MRF	Materials Recycling Facility	Scrap Recycling	N	60-MRF-1	• Sandia
TA-60-250	TA-60 Roads and Grounds	Roads & Grounds Facility	Vehicle Maintenance & Storage	Р	60-RG-1	Mortandad
				Р	60-RG-3	<ul> <li>Sandia</li> </ul>
				Р	60-RG-8	<ul> <li>Sandia</li> </ul>
TA-60-1	TA-60-1 Heavy Equipment Yard	Motor pool	Vehicle Maintenance	Р	60-HEY-2	• Sandia
TA-60-2	TA-60-2 Warehouse	Motor pool	Vehicle Maintenance	Р	60-WH-1	• Sandia
TA-9-28	TA-9-28 Heavy Equipment Maintenance	Motor pool	Vehicle Maintenance	Р	9-HEM-1	• Pajarito

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#### ATTACHMENT 5 – POLLUTANTS UNDER IMPAIRED WATERS MONITORING

Permitted Facility	Monitored Outfall	Assessment Unit	Canyon	Pollutant
TA-54 Area G	54-G-2	NM-128.A_00	Canada del Buey (within LANL)	PCBs
TA-54 Area L	54-L-1			Aluminum
TA-54-RANT	54-RANT-1			Gross Alpha
TA-54 Area G	54-G-1	NM-128.A_08	Pajarito Canyon (within LANL	PCBs
TA-54 Area G	54-G-3		below Arroyo de la Delfe)	Aluminum
TA-54 Area G	54-G-4			Copper
				Gross Alpha
TA-15-185 PHERMEX	15-PHRMX-1	NM-128.A_13	Water Canyon (within LANL	PCBs
		_	below Area-A Canyon)	Aluminum
				Gross Alpha
TA-3-39 & 102 Metal Shop	3-TS-1	NM-128.A_15	Two Mile Canyon (Pajarito to	PCBs
			headwaters)	Aluminum
				Gross Alpha
TA-9-28 Heavy Equipment	9-HEM-1	NM-128.A_16	Arroyo de la Delfe (Pajarito	Aluminum
Maintenance			Canyon to headwaters)	Mercury
				Gross Alpha
TA-60 Asphalt Batch Plant	60-ABP-1	NM-9000.A_042	Mortandad Canyon (within	Aluminum
TA-3-0034 Metal Shop	3-MST-1		LANL)	Copper
TA-60 Roads and Grounds	60-RG-1			
				Gross Alpha
		NM-9000.A_047	Sandia Canyon (Sigma Canyon	PCBs
TA-3-38 Metals Fab Shop	3-MFS-1		to NPDES outfall 001)	Aluminum
TA-3-22 Power & Steam Plant	3-PSP-1			Copper
TA-3-22 Power & Steam Plant	3-PSP-5			Gross Alpha
TA-3-22 Power & Steam Plant	3-PSP-8			Mercury
TA-3-66 Sigma Complex	3-Sigma-6			
TA-60-1 Heavy Equipment Yard	60-HEY-2			
TA-60 MRF	60-MRF-1			
TA-60 Roads and Grounds	60-RG-3			
TA-60 Roads and Grounds	60-RG-8			
TA-60-2 Warehouse	60-WH-1			

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#### ATTACHMENT 6 – ANALYTES BY INDUSTRIAL SECTOR

Permitted Facility	Monitored Outfall	Sector	Activity	Analyte	Monitoring Requirement
TA-3-0034 Metal Shop	3-MST-1	AA	Fabricated Metals	Aluminum	Quarterly Benchmark Monitoring (QBM)
TA-3-38 Metals Fab Shop	3-MFS-1			Iron	QBM
TA-3-39 & 102 Metal Shop	3-TS-1			Nitrate plus Nitrite Nitrogen	QBM
				Zinc	QBM
TA-60 Asphalt Batch Plant	60-ABP-1	D	Asphalt Paving	Oil and Grease	Effluent Limitations Guidelines (ELG)
•				pH	ELG
				Total Suspended Solids	QBM and ELG
TA-3-66 Sigma Complex	3-Sigma-6	F	Primary Metals	Copper	QBM
				Zinc	QBM
TA-54 Area G	54-G-1	К	Treatment, Storage or Disposal Facility (TSD)	Ammonia	QBM
TA-54 Area G	54-G-2			Arsenic	QBM
TA-54 Area G	54-G-3			Cadmium	QBM
TA-54 Area G	54-G-4			Chemical Oxygen Demand	QBM
TA-54 Area L	54-L-1			Cyanide	QBM
TA-54 RANT	54-RANT-1			Lead	QBM
				Magnesium	QBM
				Mercury	QBM
				Selenium	QBM
				Silver	QBM
TA-60 MRF	60-MRF-1	N	Scrap Recycling	Aluminum	QBM
				Chemical Oxygen Demand	QBM
				Copper	QBM
				Iron	QBM
				Lead	QBM
				Total Suspended Solids	QBM
				Zinc	QBM
TA-3-22 Power & Steam Plant	3-PSP-1	0	Steam Electric Power	Iron	QBM
	3-PSP-5				
	3-PSP-8				

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#### ATTACHMENT 7 – REFERENCES AND GUIDANCE DOCUMENTS

- 40 CFR 122, EPA Administered Permit Programs
- 40 CFR 136, Guidelines Establishing Test Procedures for the Analysis of Pollutants.
- Clean Water Act, Title 33 U.S.C. 1251
- DOE O 414.1C, Quality Assurance
- DOE Order 450.1, Environmental Protection Program
- DOE Order 5400.5, Radiation Protection of Public and Environment
- EPA QA/G-4, Guidance for the Data Quality Objectives Process

#### **LANL Documents:**

- P322-4, Laboratory Performance, Feedback, and Improvement
- P328-3, Management Assessments
- P328-4, Management Observation and Verification
- P330-6, Nonconformance Reporting
- P330-8, Inspection and Test for Acceptance
- P340, Conduct of Engineering
- P341, Engineering Process Manual
- P401, Procedure to Identify, Communicate, and Implement Environmental Requirements
- P407, Water Quality
- P840-1, Procurement Quality

#### **ENV Documents:**

- ENV-DO-QP-105, Preparation, Review, and Approval of Procedures
- ENV-DO-QP-106, Document Control
- ENV-DO-QP-113, Tracking Performance Feedback and Actions
- ENV-DO-QP-115, Personnel Training
- ENV-CP-QP-022, MSGP Storm Water Corrective Actions
- ENV-CP-QP-044, Preparing Storm Water Discharge Monitoring Reports (MDNRs) for NPDES MSGP
- ENV-CP-QP-047, Inspecting Storm Water Runoff Samplers and Retrieving Samples
- ENV-CP-QP-048, Processing MSGP Storm Water Samples
- ENV-CP-QP-064, Multi-Sector General Permit Storm Water Visual Inspections
- ENV-WQH-QP-029, Creating and Maintaining a Chain of Custody
- Surface Water Monitoring Plan, October 2001, Rev. 0.0

ATTACHMENT 16: EPC-CP-QP-023, MSGP ROUTINE FACILITY INSPECTIONS

EPC-CP-QP-023	Revision: 1	• Los Alamos
Effective Date: 03/07/2019	Next Review Date: 03/07/2022	NATIONAL LABORATORY EST. 1943

Environment, Safety, Health, Quality, Safeguards, Security Directorate

Environmental Protection and Compliance Division – Compliance Programs

Quality Procedure

### **MSGP Routine Facility Inspections**

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Derivative Classifier: Unclassified						
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#### **REVISION HISTORY**

Document Number and Revision [Include revision number, beginning with Revision 0]	Effective Date [Document Control Coordinator inserts effective date]	<b>Description of Changes</b> [List specific changes made since the previous revision]
EPC-CP-QP-023 R0	05/17/2018	New Document. Process formerly part of procedure ENV-RCRA-QP-022 R2, MSGP Corrective Actions.
EPC-CP-QP-023 R1	03/07/2019	Added question to inspection form, associated text to document, and renumbered steps. Removed reference to Los Alamos National Security, LLC. Added reference to LANL BMP Manual. Minor edits made.

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#### 1.0 INTRODUCTION

The National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit (MSGP), also referred to as the permit, contains specific environmental requirements for inspecting areas of Los Alamos National Laboratory (LANL) covered by the permit. This includes areas where industrial materials or activities are exposed to stormwater, areas identified as potential pollutant sources, areas where leaks and spills have occurred in the past three years, discharge points, and control measures used to comply with the effluent limits of the MSGP.

LANL inspectors and facility personnel are required to perform routine facility inspections for industrial stormwater discharge on LANL areas covered by the MSGP at least quarterly and document observations. Conditions (as described by the MSGP) found during an inspection, requiring a corrective action(s), are managed through EPC-CP-QP-022, MSGP Corrective Actions.

#### 1.1 Purpose

Parts 3.1 and 3.1.2 of the MSGP contain specific requirements for conducting and documenting periodic industrial routine facility inspections. This procedure governs the activities of LANL personnel involved in conducting industrial routine facility inspections. It also contains information and specific steps to be used for identifying and documenting conditions in order to meet the permit requirements.

#### 1.2 Scope

Requirements set forth in this document apply to LANL personnel responsible for meeting the permit conditions on behalf of LANL industrial facilities covered by the MSGP. The MSGP requires periodic inspection of facilities and identification, documentation, and reporting of conditions, including those requiring corrective actions.

Inspections conducted under this procedure are documented using the Maintenance Connection Express™ (MC Express) web application on a tablet or notebook style computer. (In the event of electronic hardware or web application failure, personnel may use a printed hard copy to conduct the inspection.)

#### 1.3 Applicability

This procedure applies to Environmental Protection and Compliance-Compliance Programs (EPC-CP) technical staff, Deployed Environmental Professionals (DEPs), and subcontractor personnel (as applicable) who conduct inspections and monitoring activities at MSGP regulated LANL facilities.

#### 2.0 ROLES AND RESPONSIBILITIES

Specific roles and responsibilities for implementation of requirements contained in the MSGP are provided below.

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#### 2.1 EPC-CP MSGP Stormwater Permitting and Compliance Team

EPC-CP MSGP Stormwater Permitting and Compliance personnel are fully knowledgeable of the specific regulatory requirements identified in the MSGP and are responsible for the following:

- Implementing this procedure;
- Performing routine facility inspections the last month or quarter of the year at regulated sites [depending on inspection frequency identified in site-specific Stormwater Pollution Prevention Plans (SWPPPs)];
- Performing "no exposure" site inspections once a year to ensure conditions of the "no exposure" exclusion are met;
- Performing routine facility inspections at inactive sites once a year;
- Identifying issues requiring a corrective action during any of the above inspections or assessments;
- Determining a condition of non-compliance;
- Notifying managers, or legal counsel of non-compliances;
- Modifying the site-specific MSGP Routine Facility Inspection Form to add new Best Management Practices (BMPs) or decommission retired ones;
- Training personnel to use MC Express;
- Performing a quality review of routine facility inspections and "no exposure" site inspections submitted in Maintenance Connection (MC); and
- Assisting customers with issues associated with MC Express.

#### 2.2 Deployed Environmental Professionals

DEPs are responsible for the following:

- Implementing this procedure;
- Being educated (i.e., knowledgeable) of the requirements contained in site-specific SWPPPs within their assigned Facility Operations Directorate (FOD);
- Meeting qualification requirements identified in the Quality Assurance Project Plan EPC-CP-QAPP-MSGP, Stormwater Multi-Sector General Permit for Industrial Activities Program;
- Being trained on EPC-CP-QP-022, Multi-Sector General Permit (MSGP) Corrective Actions;
- Being trained on MSGP Routine Inspections OJT;
- Being familiar with industrial site and facility operations assigned to them so that they
  minimize sources of pollutants and pro-actively maintain controls to prevent issues that
  require corrective action;

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- Performing routine facility inspections, either monthly or quarterly throughout the year at regulated sites within their FOD (depending on inspection frequency identified in sitespecific SWPPPs) and documenting results accurately;
- Acting as liaison between the FOD, Deployed Environment, Safety, and Health (DESH)
   Manager and facility/operations personnel to ensure corrective actions are addressed appropriately by overseeing maintenance and/or installation of additional controls;
- Educating appropriate facility/operations personnel on the MSGP and site-specific SWPPPs so they successfully implement the conditions of the permit; and
- Notifying EPC-CP MSGP stormwater personnel when additional or substitute BMPs have been installed or old BMPs have been removed so the site-specific MSGP Routine Facility Inspection Form can be modified.

#### 2.3 EPC-CP Stormwater Permitting and Compliance Team Leader

The EPC-CP Stormwater Permitting and Compliance Team Leader is responsible for compliance oversight relative to the MSGP. The Team Leader ensures adequate resources needed to implement the regulatory requirements identified in the MSGP are identified and environmental risks are assessed. The Team Leader will notify upper management of these required resources or environmental risks, as deemed necessary. In the event there is a dispute regarding the regulatory requirements contained in the MSGP, the Team Leader makes the final determination of the required action. The Team Leader notifies upper management of instances of non-compliance with the permit.

#### 2.4 EPC-CP Group Leader

The EPC-CP Group Leader or designee is responsible for ensuring there are adequate resources to implement the regulatory requirements identified in the MSGP. The Group Leader or Team Lead also acts as the duly authorized signatory that certifies the Annual Report, MSGP Routine Facility Inspections, or "no exposure" site inspections conducted by EPC-CP personnel. The Group Leader notifies upper management of instances of non-compliance with the permit or other identified environmental risk.

#### 2.5 DESH Manager

The DESH manager works with programmatic entities and the FOD to identify adequate resources for their industrial facilities to ensure permit requirements can be implemented. The DESH Manager is responsible for the performance of DEPs under their management and to ensure DEPs are trained and qualified. They also provide oversight by ensuring that industrial facilities complying with the MSGP and will notify upper management of instances of non-compliance with the permit or other identified environmental risk.

#### 3.0 PRECAUTIONS AND LIMITATIONS

The hazard rating for the activities described in this procedure is **LOW** and therefore, does not require an IWD.

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Field inspections may be discontinued during periods or conditions that make sites dangerous for worker safety or prevent personnel from safely accessing sites (e.g., weather-related events such as flash floods, flooding, lightning, wildfires, hail, icy roads, deep snow, or LANL operations such as firing shots or burns).

#### 4.0 PREREQUISITE ACTIONS

#### 4.1 Planning and Coordination

- 1. Schedule work to be completed by the target date appearing on the inspection form or as requested by the MSGP program lead if an inspection form is not issued.
- Inform (e.g., by e-mail) facility contacts (as needed) of the schedule for facility inspection
  work and locations up to a week (preferred) before but no later than the day before (for
  minor changes) to be added to the appropriate plan of the day (as necessary).
- 3. Obtain any necessary additional paperwork before conducting this work, including SWPPPs and maps (as necessary).

#### 4.2 Tools and Equipment

Ensure the following equipment is available.

- Sturdy hiking boots or steel toed shoes with soles that grip and other facility specific PPE as needed.
- Cell phone (Only government cell phones are allowed in secure areas. See <a href="https://int.lanl.gov/policy/documents/P217.pdf">https://int.lanl.gov/policy/documents/P217.pdf</a> for requirements for using portable electronic devices on Laboratory property.)
- Copy of this procedure.
- Copy of facility specific SWPPP and map(s) (as needed).
- Current electronic or paper inspection form EPC-CP-Form-1020, MSGP Routine Facility Inspection.
- LANL issued tablet or notebook style computer with Safari web browser and Blackberry
   UEM™ app (see <a href="https://int.lanl.gov/policy/documents/P217.pdf">https://int.lanl.gov/policy/documents/P217.pdf</a> for requirements for using
   portable electronic devices on Laboratory property).
- Necessary access keys.

#### 5.0 MSGP ROUTINE FACILITY INSPECTIONS

MSGP routine facility inspections are conducted by the DEP or other qualified facility personnel (as defined in the MSGP or as determined by MSGP program lead) during periods when the facility is in operation and during standard operating hours. The inspections are performed on the following facility areas:

• Areas where industrial materials or activities are exposed to stormwater;

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- Areas identified in the SWPPP and those that are potential pollutant sources;
- Areas where spills and leaks have occurred in the past;
- Discharge points; and
- Control measures used to comply with the effluent limits contained in the MSGP.

Routine facility inspections are conducted at least quarterly; however, some facilities may conduct monthly inspections (as specified in the facility specific SWPPP). At least once each calendar year, the routine facility inspections must be conducted during a period when stormwater discharge (either rain or snow) is occurring. During the inspection, you must look for the following:

- Industrial materials, residue or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks and other containers;
- Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site;
- Tracking or blowing of raw, final or waste materials from areas of "no exposure" to exposed areas; and
- Control measures that need replacement, maintenance or repair.

Conditions requiring corrective action identified during an inspection, monitoring, or other means must be entered into the MSGP Corrective Action Report database by the DEP(s), EPC-CP stormwater personnel and/or other qualified facility personnel (as defined in the MSGP or as determined by MSGP program lead). Follow the process in EPC-CP-QP-022, *MSGP Corrective Actions* to address issues found during an inspection.

If the industrial facility is inactive and unstaffed and there are no industrial materials or activities exposed to stormwater, routine inspections may not be required. A determination of whether a facility is inactive or unstaffed is made in coordination with stormwater personnel from EPC-CP, as there are specific documentation and certification requirements that have to be met prior to discontinuing routine inspections. Such a facility is only required to conduct an annual site inspection.

If the industrial facility is eligible for a "no exposure" exclusion, routine inspections are no longer required. A condition of "no exposure" exists when all industrial materials and activities are protected by a storm resistant shelter (e.g., moved to an indoor location) to prevent exposure to rain, snow, snowmelt, and/or runoff. A determination of whether a facility is eligible for "no exposure" status is made in coordination with stormwater personnel from EPC-CP, as there are specific documentation and certification requirements that have to be met prior to discontinuing routine inspections. Such a facility is only required to conduct an annual site evaluation and recertification every five years.

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#### 5.1 Conducting the Inspection

See Attachment 1 for screen shot examples of EPC-CP-Form-1020, MSGP Routine Facility Inspection in MC Express. See Attachment 2 for an example of the inspection form in hard copy format.

Some terminology varies between the MC Express software and the MC desktop software. The "Complete" option in MC Express is the same as a "Yes" answer; the "Failed" option in MC Express is the same as a "No" answer. MC desktop and hard copy (printed) work orders use "Yes" and "No" terminology.

If the inspector needs space, additional comments can be entered in the "Labor Report" field (see Section 5.2) when the work order is updated to "Complete" status in MC Express. If completing a hard copy enter additional comments in the "Labor Report" field at the bottom of the form.

- 1. Use the Internet Explorer web browser on a tablet or similar portable computer and navigate to <a href="http://express.maintenanceconnection.com">http://express.maintenanceconnection.com</a>. Log into the MC Express application using your login credentials.
- 2. Open the inspection form for the location to be inspected and select "Tasks" to navigate to the Tasks page.
  - **NOTE 1:** Each item number listed in red font below corresponds to a numbered box on both screen shots (Attachment 1) and hard copy format (Attachment 2).
- 3. Item 1: Observe the weather at time of inspection. Document the weather and temperature in the "Comments" field. Document this task is or is not completed by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes".

#### **CAUTION**

Click the "Save" bar after entries for a task line have been completed and before proceeding to the next question. Failure to "Save" results in lost data entries.

- 4. Item 2: Observe and document the facility is free of **new** discharges of pollutants **since the last inspection** by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe any new discharges and the specific location in the "Comments" field of the task line.
- 5. Item 3:

**IF** the response to Item 2 is "Complete"

**THEN** click the expand arrow located on the right side of this task line and change the "N/A" line to "Yes".

OR

IF the response to Item 2 is "Failed",

<u>THEN</u> document any corrective action previously initiated for the discharge by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes".

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- 6. Item 4: Observe and document the facility is free of discharges of pollutants at the time of inspection by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe any pollutant discharge and the specific location in the "Comments" field of the task line.
- 7. Item 5: Observe and document the facility is free of evidence of pollutants entering the drainage system OR the potential for pollutants entering the drainage system by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe any discharge or potential discharge and the specific location in the "Comments" field of the task line.
- 8. **Item 6**: Observe and document the outfall does not have any **new** evidence of erosion **since the last inspection** by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe any erosion observed in the "Comments" field of the task line.
- 9. Item 7: Observe and document all flow dissipation devices are operating effectively and are not in need of repair by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe any non-functional status of devices in the "Comments" field of the task line.
- 10. Item 8: Observe and document the outfall is free of evidence of pollutants in the discharge and/or the receiving water by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe any pollutants observed in the "Comments" field of the task line.
- 11. Item 9: Observe and document the outfall is free of unauthorized non-stormwater discharges by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe any unauthorized discharges observed in the "Comments" field of the task line.
- 12. If the location has more than one outfall, complete Steps 8 through 11 for each outfall shown on the work order.
- 13. Item 10: Observe and document each control measure is operating effectively by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe any non-operational condition of the control measure (e.g., erosion, damage, etc.) and if the control measure needs maintenance, repair, or replacement in the "Comments" field of the task line.
  - **NOTE 2**: If the DEP or EPC-CP MSGP stormwater personnel determine that additional controls are necessary, or that existing controls are insufficient and require replacement with a different type of control, the DEPs are responsible for the selection and oversight of proper installation of appropriate control measures per guidance provided in the <a href="LANL Stormwater BMP Manual"><u>LANL Stormwater BMP Manual</u></a>.
- 14. <u>IF</u> the location has more than one control measure, <u>THEN</u> complete Step 13 for each control measure shown on the work order.

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- 15. Item 11: Observe and document each sector of NPDES specified industrial area/activity (e.g., metal fabrication; foundry operations; power generation; asphalt production; fabricating timber products; material recycling; warehouse and transportation activity; treatment and storage of hazardous waste) is inspected for exposure to stormwater. Document by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes".
  - Determine if the control measures associated with each industrial area/activity are appropriate for the activity, effectively controlling stormwater exposure, and operating. Describe any non-operational condition of the control(s) and needed maintenance or a description of corrective actions in the "Comments" field of the task line.
- 16. **IF** the facility has more than one sector of NPDES specified industrial area/activity, **THEN** complete Step 15 for each industrial area/activity shown on the work order.
  - For industrial activities that do not apply to the facility, click the expand arrow located on the right side of the task line and change the "N/A" line to "Yes".
- 17. Item 12: Observe and document the facility is free of discharges of any non-compliance not documented elsewhere on the inspection form by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe any additional incidences of non-compliance in the "Comments" field of the task line.
- 18. Item 13: Observe and document the facility meets the MSGP requirements with existing control measures by clicking the expand arrow located on the right side of the task line and change the "Complete" to "Yes". If additional control measures are needed to comply with the Permit, click the expand arrow located on the right side of the task line and change the "Failed" to "Yes" and describe the control measures in the "Comments" field of the task line.
- 19. When all task lines have been completed, make sure you have clicked the "Save" bar at the bottom of the page.
- 20. Click the "Back" arrow button in the upper left hand corner to exit the work order Tasks page and return to the Work Order Summary page.

Always log out of MC Express when you have finished work OR if work is interrupted.

#### 5.2 Completing the Inspection Form in MC Express

See Attachment 1 for screen shot examples of EPC-CP-Form-1020, MSGP Routine Facility Inspection in MC Express.

1. Click the checkered flag in the upper right corner of the work order Summary page.

#### **CAUTION**

MC Express automatically changes the work order status to "Closed" and auto-populates the date and time fields.

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 Item 14: Click on the expand arrow located on the right side of the "New Status" field and select "Completed" from the available dropdown menu. Ensure the date and time autopopulated are the date and time the on-site field inspection was completed (not the date/time the form was filled out).

IF these fields need to be updated,

#### THEN

- [a] Click the "Date" field to open the pop-up window.
- [b] Make necessary adjustments using the timestamp application.
- [c] Click "Set" to apply changes.
- 3. Item 15: The inspector types in his/her name in the "Labor Report Update" field.

Any additional notes, observations, or site conditions not documented in a task line "Reading" or "Comments" field can be documented in the "Labor Report Update" section.

- 4. Scroll down the page to the "Signature" bar and click the expand arrow on the left side of the bar to open the "Signature" field.
- 5. **Item 16**: Capture an electronic signature by drawing with a finger on the tablet screen. The field inspector is certifying that the information submitted is "true, accurate, and complete" by electronically signing the work order.

**NOTE:** If using MC Express on a desktop screen (not a tablet), the mouse is used to draw a signature.

- 6. Click on the "Save" bar at the bottom of the page to close the "Signature" field.
- 7. Click on the "Back" button located in the upper left hand corner to return to the "My Open Work Orders" page.
- 8. Once you have completed an inspection, click on the Menu button again, and then click the "Logout" bar. Close the browser. All work will be automatically uploaded from the MC Express application to the MC database.

Always log out of MC Express when you have finished work OR if work is interrupted.

#### 5.3 Completing the Inspection Form on Hardcopy

See Attachment 2 for an example of EPC-CP-Form-1020, MSGP Routine Facility Inspection in hard copy format.

1. Item 14: Write in the date and time the inspection was completed and *not* the date/time the form was filled out.

<u>IF</u> an inspection needs to be performed over multiple days, THEN note the date and time the inspection began in the Labor Report field.

- 2. Item 15: The field inspector prints his/her name.
- 3. The field inspector reviews the inspection form for accuracy.

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**IF** a correction or update is needed,

**THEN** the inspector will draw a single line through the information to be updated, write in the new information, and add his/her initials and the date the information was updated.

4. Item 16: The field inspector certifies that the information submitted is "true, accurate, and complete" by signing his/her name and dating when the form was signed.

#### 5.4 Completing the Certification Statement

Follow Steps 1 through 5 in this section if the inspection form was completed electronically (see Attachment 1). If the inspection form was completed on a hard copy form, skip to Step 6.

- Using the Internet Explorer web browser on a desktop computer, navigate to <a href="http://www.maintenanceconnection.com">http://www.maintenanceconnection.com</a>. Log into the MC desktop application using your login credentials.
- 2. Click "Open" in the tool bar at the top of the page to open the MC module selections. Click on the "Work Orders" module.
- 3. Click on the "Search" tab at the top left of the page and enter the work order number in the "Search Value" field. Click the arrow to the right of the "Search Value" field to open the work order in the right split screen.
- 4. Click on the "Report" tab at the top of the page and click the "Work Order Statement" subtab.
- 5. Click the Tools drop down menu in the top right corner of the page and select "Print" from the options. The print dialog box will open. Select the print options as appropriate for your local printer.
- 6. Item 17: Obtain a printed name and title, signature, and date on the certification statement. The routine facility inspection form must be certified with a signature from a manager that meets the definition of a signatory in MSGP Permit Section B.11.A (e.g., FOD, Operations Manager, DSESH Group Leader, EPC-CP Group Leader, EPC-CP Team Lead). The manager is certifying the information submitted is "true, accurate, and complete" by signing the form.

The certification statement will be signed no more than 14 days after completion of the inspection.

7. Attach the completed, signed, and certified inspection form to the facility SWPPP.

#### 6.0 TRAINING

The following personnel require training before implementing this procedure.

- DESH Group and Team Leaders
- EPC-CP MSGP stormwater compliance personnel
- DEPs

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• Other LANL or subcontract personnel identified as being required to conduct stormwater assessments as part of their job duties

For EPC-CP staff, the training method for this procedure is "self-study" (required reading). Other participating groups may require training documentation pursuant to local procedures.

Personnel performing this procedure will be familiar with the most current versions of the following procedures.

- EPC-CP QAPP-MSGP Quality Assurance Project Plan for the Stormwater Multi-Sector General Permit for Industrial Activities
- EPC-CP-QP-022, MSGP Corrective Actions
- MSGP Routine Inspections OJT

#### 7.0 RECORDS

MSGP Routine Facility Inspection forms are signed and certified by individual facilities. These completed forms are maintained in the facility's SWPPP and managed by the facility's document management system. The MSGP team may obtain a copy for reference purposes.

#### 8.0 DEFINITIONS AND ACRONYMS

See LANL <u>Definition of Terms</u>.

#### 8.1 Definitions

**Best Management Practice (BMP)** – Schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of "waters of the United States." BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage (40 CFR Part 122.2).

**Control Measure** – Any BMP or other method (including effluent limitations) used to prevent or reduce the discharge of pollutants to waters of the United States.

#### 8.2 Acronyms

See LANL <u>Acronym Master List</u>.

ВМР	Best Management Practice
EPC-CP	Environmental Protection and Compliance – Compliance Programs
DEP	Deployed Environmental Professional
DESH	Deployed Environment, Safety, and Health
IWD	Integrated Work Document
FOD	Facility Operations Director
LANL	Los Alamos National Laboratory
MC	Maintenance Connection

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MC Express	Maintenance Connection Express
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SWPPP	Stormwater Pollution Prevention Plan

#### 9.0 REFERENCES

Federal Register, Final National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Industrial Activities. Federal Register: June 16, 2015, Volume 80, Number 115.

Los Alamos National Laboratory Storm Water BMP Manual.

#### 10.0 ATTACHMENTS

**Attachment 1:** Screenshot Examples of EPC-CP-Form-1020, MSGP Routine Facility Inspection in MC Express

Attachment 2: EPC-CP-Form-1020, MSGP Routine Facility Inspection Hard Copy Example

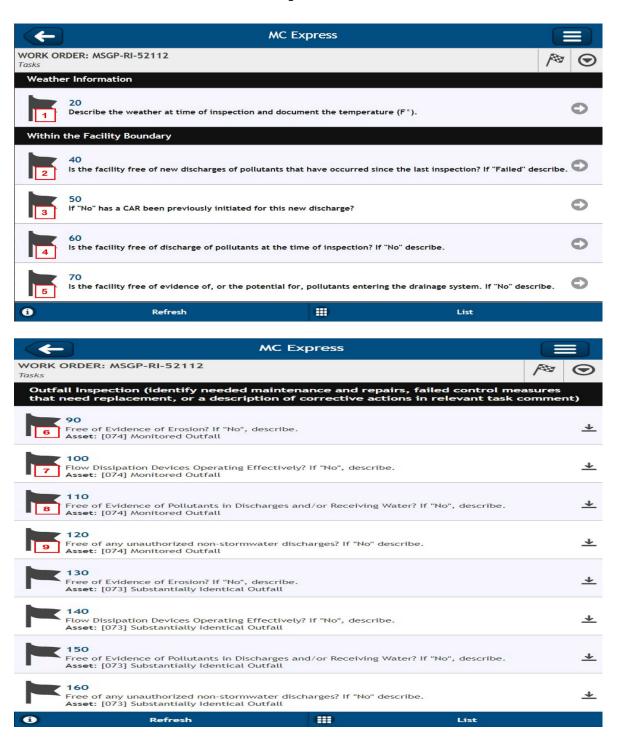
<b>MSGP</b>	<b>Routine</b>	<b>Facility</b>
Inspec	tions	•

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### Attachment 1: Screenshot ExampleS of EPC-CP-Form-1020, MSGP Routine Facility Inspection in MC Express

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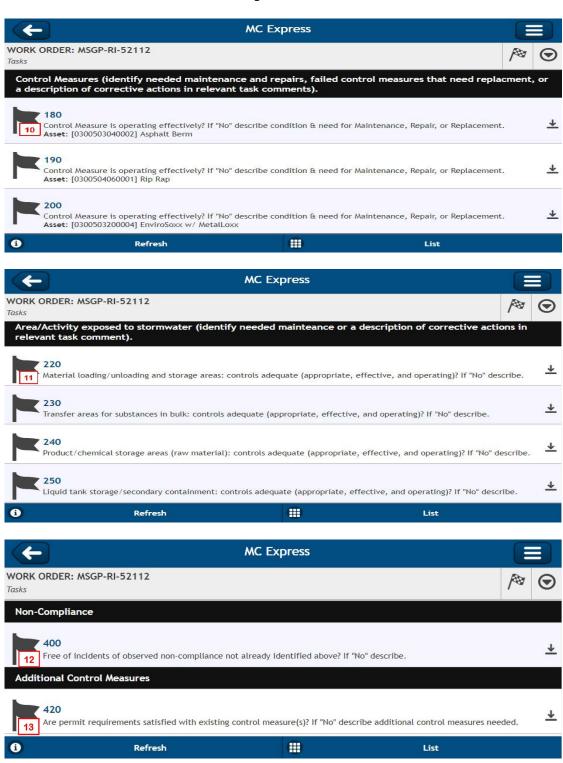
<b>MSGP</b> Routine	<b>Facility</b>
Inspections	_

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### Attachment 1: Screenshot ExampleS of EPC-CP-Form-1020, MSGP Routine Facility Inspection in MC Express (cont.)

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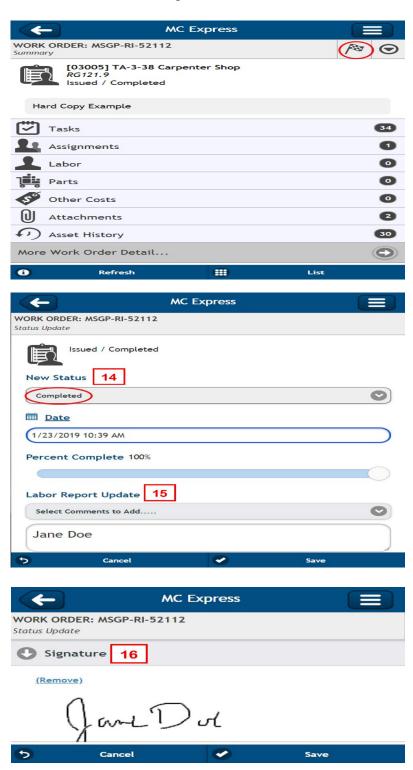


<b>MSGP</b> Routine	<b>Facility</b>
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### Attachment 1: Screenshot ExampleS of EPC-CP-Form-1020, MSGP Routine Facility Inspection in MC Express (cont.)

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## MSGP Routine Facility Inspections

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### Attachment 2: EPC-CP-Form-1020, MSGP Routine Facility Inspection Hard Copy Example Page 1 of 3

	Los A	lam	os National La	aborator	у	1,000	ork Orde	MSGF	Routin	e Inspection
-	Mainten	ance I	Details ————			Fillited	1/23/2019 -	12.40 F	W (Dup	licate Copy)
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Т					time of inspection? If "No" de or, pollutants entering the dra			- 10		
Ę	70		n. If "No" describe.	ir trie poteritiarit	or, politicants entering the dra	iiriage				
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4	110		If "No", describe.	unu unautharizas	l non-stormwater discharges	2 If "NIo"		-8		
9	120	describ		my unaumonzec	i non-storniwater discharges	r II INO				
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	140			731 Free of Evic	dence of Pollutants in Discha	raes		-6		
	150	and/or	Receiving Water? If "No", o	lescribe.						
	160		antially Identical Outfall [0 rges? If "No" describe.	073] Free of any	unauthorized non-stormwate	er		П		
10	7 Control	Measu	res (identify needed main	tenance and re	pairs, failed control measu	res that ne	ed replace	nent. o	ra	
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	230		ing)? If "No" describe		1 X-1-1 [a. (a. (a. )	4				

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## Attachment 2: EPC-CP-Form-1020, *MSGP Routine Facility Inspection* Hard Copy EXAMPLE (cont.) Page 2 of 3

240	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.	
250	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.	
260	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
270	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
280	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
290	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
300	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	
310	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
320	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	
330	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	
340	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	
350	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	
360	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	
370	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	
380	Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
Non-C	ompliance	
400	Free of incidents of observed non-compliance not already identified above? If "No" describe.	0 0 0
A 44141	and Control Magazine	
Additio	onal Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe	
420	additional control measures needed.	
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.abor	Report	
Comp	leted: 1/23/2019 10:39:00 AM	
Repor	t: [Additional notes, observations, or site conditions not documented in Task Line Comments field]	
	Jane Doe	
	Jan Dol 1/23/2019	
	/Signature / Name Date Signature / Name	Date
confi	m the information as recorded is true, accurate and complete.	

EPC-CP-Form-1020.2 01/2019

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### Attachment 2: EPC-CP-Form-1020, MSGP Routine Facility Inspection Hard Copy EXAMPLE (cont.) Page 3 of 3

#### CERTIFICATION STATEMENT

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

(Signatory must meet definition in Section B.11.A, eg., FOD, Ops Mgr, DESH Group Leader, EPC Group Leader)

17 Print name and title:	
Signature:	Date:

EPC-CP-Form-1020.2 01/2019

ATTACHMENT 17: EPC-CP-QP-022, MSGP CORRECTIVE ACTIONS

EPC-CP-QP-022	Revision: 3
Effective Date: 12/20/2018	Next Review Date: 12/20/21



Environment, Safety, Health, and Quality, Safeguards and Security Directorate

Environmental Protection and Compliance Division – Compliance Programs

Quality Procedure

# **MSGP Corrective Actions**

#### **Document Owner/Subject Matter Expert:**

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Derivative Classifier:   Unclassified			
Name:	Organization:	Signature:	Date:
Jacob Meadows	EPC-CP	Signature on File	12-19-18

#### **Approval Signatures:**

Ī	Subject Matter Expert:	Organization:	Signature:	Date:
	Holly Wheeler	EPC-CP	Signature on File	12-19-18
Ī	Responsible Line Manager:	Organization:	Signature:	Date:
	Terrill Lemke	EPC-CP Team Leader	Signature on File	12-20-18
Ī	Responsible Line Manager	Organization	Signature:	Date:
	Taunia Van Valkenburg	EPC-CP Group Leader	Signature on File	12-20-18

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# **Revision History**

Document Number and Revision [Include revision number, beginning with Revision 0]	Effective Date [Document Control Coordinator inserts effective date]	Description of Changes [List specific changes made since the previous revision]
0	08/10	New Document.
1	11/10	Incorporated EPC-CP-QP-062 MSGP Routine Inspections into this document.
2	01/13	Biennial revision, new template implemented.
EPC-CP-QP-022 R3	12/202018	Revision to reflect new 2015 MSGP requirements. New procedure format was used and organizational changes made. This document replaces ENV-RCRA-QP-022, R2, which was split into EPC-CP-QP-023, R0, MSGP Industrial Stormwater Routine Facility Inspections, and EPC-CP-QP-022, R3, MSGP Corrective Actions.

# **MSGP Corrective Actions**

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#### 1.0 INTRODUCTION

The National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit (MSGP) contains specific environmental requirements for identifying, implementing, documenting and reporting conditions requiring corrective actions. Laboratory personnel (the Deployed Environmental Professionals (DEPs) and Environmental Protection and Compliance Division — Compliance Programs (EPC-CP) Storm Water Team (also referred to as EPC-CP MSGP stormwater personnel) are required to perform routine facility inspections and document all conditions requiring corrective actions found on an inspection form (see EPC-CP-QP-023). Conditions requiring corrective actions can be identified during facility walk-downs, normal daily operations, and/or analytical data evaluations, and can be identified by facility personnel, the DEP or EPC-CP MSGP stormwater personnel.

#### 1.1 Purpose

This procedure governs the activities of Laboratory personnel working at Los Alamos National Laboratory (LANL) involved in identifying, implementing, documenting and entering a condition requiring corrective action, including a permit limit exceedance, into the MSGP Corrective Action Report (CAR) Findings database or CAR database. Part 4.4 of the MSGP contains specific documentation requirements relative to corrective actions. This procedure satisfies these requirements.

#### 1.2 Scope

Requirements set forth in this document apply to personnel responsible for meeting the permit conditions on behalf of LANL industrial sites covered by the MSGP. This permit requires periodic inspection of sites and identification, implementation, documentation, tracking and reporting of conditions requiring corrective actions.

#### 1.3 Applicability

This procedure applies to the EPC-CP MSGP stormwater personnel and DEPs who conduct stormwater inspections and monitoring activities at permitted MSGP sites within LANL.

#### 2.0 PRECAUTIONS AND LIMITATIONS

- 2.1 The hazard level for field activities and office work described in this procedure is a **LOW hazard** rating and does not require an Integrated Work Document (IWD).
- 2.2 Inspections or walk-downs may be discontinued during periods or conditions that make sites dangerous for worker safety or prevent personnel from safely accessing sites (e.g., weather-related events such as flash floods, flooding, lightning, wildfires, hail, icy roads, deep snow, or LANL operations such as firing shots or open burning).

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#### 3.0 PREREQUISITE ACTIONS

#### 3.1 Planning and Coordination

DEPs and EPC-CP MSGP stormwater personnel require a CAR database user account (<a href="https://msgp-car.lanl.gov/forms/frmservlet?config=msgp-car">https://msgp-car.lanl.gov/forms/frmservlet?config=msgp-car</a>). Facility Operations Directors (FODs), Deployed Environment, Safety, and Health (DESH) Managers and Operations (Ops) Managers can request a read-access account by contacting the EPC-CP MSGP data administrator for access.

#### 3.2 Tools and Equipment

Tools and equipment for documenting inspections and updating the CAR database include the following:

- LANS issued tablet or notebook style computer with Safari web browser and Blackberry
   UEM™app. (see <a href="https://int.lanl.gov/policy/documents/P217.pdf">https://int.lanl.gov/policy/documents/P217.pdf</a> for requirements on using portable electronic devices on Laboratory property), and
- Access to the CAR database.

Tools and equipment for field work associated with performing inspections and site walk-downs are listed below.

- Sturdy hiking boots or steel or composite toed shoes with soles that grip (some sites require steel or composite toed shoes).
- Safety glasses if required by site.
- Cell phone (only government cell phones with batteries removed are allowed in secure areas.) See <a href="https://int.lanl.gov/policy/documents/P217.pdf">https://int.lanl.gov/policy/documents/P217.pdf</a> for requirements on using portable electronic devices on Laboratory Property.)
- Copy of this procedure.
- Copy of facility specific Stormwater Pollution Prevention Plan (SWPPP) and map(s) (as needed).
- Necessary access.
- Stockpile of temporary stormwater controls (Best Management Practices [BMPs], e.g., inlet protection, absorbent pads for spills, gravel bags, S-Fence, wattles, etc.)

#### 4.0 ROLES AND RESPONSIBILITIES

Specific roles and responsibilities for implementation of requirements contained in the MSGP are provided below.

#### 4.1 EPC-CP MSGP Stormwater Personnel

EPC-CP MSGP stormwater personnel will be fully knowledgeable of the specific regulatory requirements identified in the MSGP. Additional responsibilities are listed below.

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- Implement this procedure;
- Oversee the corrective action process;
- Identify conditions requiring corrective action during internal routine facility inspections, "no exposure" assessments, and/or facility walk-downs performed by them, or during evaluation of monitoring data when permit limits are exceeded;
- Perform a quality review of conditions requiring corrective action submitted in the CAR database;
- Notify managers and/or legal counsel of non-compliances;
- Assist DEPs and other customers with issues associated with the CAR database;
- Prepare and submit 45-day exceedance notification to Region 6, Environmental Protection Agency (EPA) containing information provided by the DEP;
- Prepare and submit the Annual Report summarizing all conditions requiring corrective action for the year in EPA's electronic NPDES eReporting tool (NeT);
- Prepare management requested metrics relative to conditions requiring corrective action;
- Provide information to the Issues Management Coordinator (IMC) for entering water quality exceedances and other permit violations into the Issues Management (IM) tool; and
- Train personnel to use the CAR database.

#### 4.2 Deployed Environmental Professionals

DEPs will be fully knowledgeable of the site-specific SWPPP for their assigned sites and corrective action requirements identified in the MSGP. In addition, they shall be appropriately trained to meet the job qualifications identified in the *Quality Assurance for Stormwater Multi-Sector General Permit for Industrial Activities Program* (ENV-CP-QAPP-MSGP) and shall be familiar with the regulatory requirements identified in the MSGP, demonstrated by achieving a satisfactory score on the *MSGP Routine Facility Inspections* on-the-job training course #53040. Further, they shall be familiar with facility operations and controls to minimize potential pollutant sources and proactively maintain controls in an attempt to prevent conditions that require corrective action.

The DEPs are responsible for implementing this procedure. They will identify conditions requiring corrective actions observed at their industrial sites and enter them into the CAR database. DEPs act as liaison between the FOD, DESH Manager and facility/operations personnel to ensure all corrective actions are addressed appropriately by overseeing maintenance and/or installation of additional controls, as needed. DEPs are responsible for ensuring corrective action(s) is completed per MSGP requirements and the corrective action timeline (see Sections 5.2.1 and 5.2.2 of this procedure). They will also provide timely updates to the CAR database for closure or update of corrective actions as they are implemented.

When permit limits are exceeded, DEPs are responsible for identifying the source and maintaining existing controls or implementing additional controls, as necessary, to prevent further exceedances.

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If the DEP or EPC-CP MSGP stormwater personnel determine that additional controls are necessary, or that existing controls are insufficient and require replacement with a different type of control, the DEPs are responsible for the selection and oversight of proper installation of appropriate control measures per guidance provided in the <u>LANL Stormwater BMP Manual</u>.

DEPs will notify the EPC-CP MSGP data administrator or MSGP Program Lead of key personnel changes (FOD, DESH Manager, Ops Manager, DEP) to ensure automated CAR status notifications are distributed to the appropriate personnel.

#### **CAUTION**

#### Failure to appropriately control pollutant discharges can result in fines and penalties.

Implementing the same control measure numerous times without an improvement in minimization of off-site pollutants is an indication that the control measure is not stringent enough to meet Technology-Based or Water Quality-Based effluent limits identified in the MSGP. Per the MSGP, documentation is required in the SWPPP that justified the selection, design, installation and implementation of a control measure to ensure effluent limits are met.

#### 4.3 EPC-CP Storm Water Team Leader

The EPC-CP Storm Water Team Leader (or team leader) is responsible for compliance oversight relative to the MSGP. The team leader will ensure resources needed to implement the regulatory requirements identified in the MSGP are identified and environmental risks are assessed. Upper management will be notified of these resources or environmental risks, as deemed necessary. In the event there is a dispute regarding the regulatory requirements contained in the MSGP, the Team Leader will make the final determination of the required action. The Team Leader will notify upper management of instances of non-compliance with the permit.

#### 4.4 EPC-CP Group Leader

The EPC-CP Group Leader or designee is responsible for ensuring there are adequate resources to implement the regulatory requirements identified in the MSGP. The group leader also acts as the duly authorized signatory that certifies the Annual Report or Routine Facility Inspections conducted by EPC-CP personnel. The group leader will notify upper management of instances of non-compliance with the permit or other identified environmental risk.

#### 4.5 DESH Manager

The DESH Manager shall work with programmatic entities and the FOD to identify resources for their industrial sites to ensure permit requirements can be implemented. The DESH Manager is responsible for the performance of DEPs under their management. They also provide oversight for ensuring that industrial sites are complying with the MSGP and are responsible for notifying upper management of instances of non-compliance with the permit or other identified environmental risk they become aware of.

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#### 4.6 Facilities Operations Director

The FOD provides organizational leadership to ensure that all facility and programmatic activities under their authority are performed in compliance with the MSGP. The FOD is also responsible for establishing an environmental compliance envelope. It is the FOD's responsibility to maintain trained and qualified DEPs and Waste Management Coordinators (WMCs) on staff.

#### 5.0 PROCESS DESCRIPTION

Requirements regarding corrective actions are described in Part 4 of the MSGP. These requirements and conditions are summarized in this section and directly correspond to data fields and lists of values available in the CAR database.

## 5.1 Identifying Conditions Requiring Corrective Actions

#### **Deployed Environmental Professional (DEP)**

- [1] <u>IF</u> any of the following conditions are identified, <u>THEN</u> review and revise, as appropriate, the selection, design, installation, and implementation of control measures in the SWPPP to eliminate the condition and prevent recurrence in the future:
  - An unauthorized release or discharge (e.g., spill, leak, or discharge of nonstormwater not authorized by the MSGP [see Section 5.6 of this procedure for a description of allowable discharges]);
  - An inspection or evaluation of the facility by an EPA official and/or local or State entity, determines that modification to the control measures are necessary to meet the non-numeric effluent limits in the MSGP;
  - It is observed during the routine facility inspection, facility walk-down, and/or the quarterly visual assessment that the control measures are not being properly operated and maintained;
  - Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged;
  - The average of four quarterly sampling results exceeds an applicable benchmark.
     If less than four benchmark samples have been taken, but the results are such
     that an exceedance of the four quarter average is mathematically certain, (i.e., if
     the sum of quarterly sample results to date is more than four times the
     benchmark level) this is considered a benchmark exceedance;
  - If effluent limitation guidelines are exceeded at the Asphalt Batch Plant (Sector D); or
  - If impaired water quality standards are exceeded.

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#### **DEP and/or EPC-CP MSGP stormwater personnel**

[2] Enter all conditions requiring a corrective action into the EPC-CP MSGP CAR database.

#### **DEP and/or Facility Personnel**

- [3] Take immediate action to mitigate the condition requiring a corrective action.
- [4] If needed, follow the permit timeline and process for individual corrective actions that require extensive maintenance.
- [5] Any person authorized to conduct work at LANL can identify a potential stormwater issue. If this occurs, they will:
  - [a] Contact the DEP or EPC-CP MSGP stormwater personnel.
  - [b] The DEP or EPC-CP MSGP stormwater personnel will determine if a condition exists that requires a corrective action.

#### 5.2 Corrective Action Deadlines and Documentation

Specific deadlines for taking corrective action and required documentation are provided in the subsections below.

#### 5.2.1 Immediate Action

## **DEP and/or Facility Personnel**

- [1] <u>IF</u> a condition exists that requires corrective action, as described in Section 5.1 [1], <u>THEN</u> take the following action immediately (on the same day the condition is found):
  - [a] All reasonable steps necessary to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational.
  - [b] Clean up any contaminated surfaces so that material will not discharge during subsequent storm events.
  - [c] Minimize or prevent the discharge of pollutants until a permanent solution (if necessary) is installed and made operational.
  - [d] Any corrective action resulting in a change to a stormwater control or procedure (documented in the SWPPP) requires modification of the SWPPP within 14 calendar days of completing corrective action work.

#### NOTE

For minor conditions, immediate action is often sufficient and no additional action is necessary.

[2] <u>IF</u> a condition is identified at a time in the work day when it is too late to initiate corrective action (i.e., 3:00 pm or later), <u>THEN</u>:

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- [a] Corrective action must begin no later than the following work day.
- [b] Implement the requirements identified in Section 5.2.1 [1] above.

#### **CAUTION**

Solely calling or e-mailing personnel requesting action to be taken is not considered taking immediate action. Entering a Facility Service Request (FSR) is appropriate if it formally starts the work process to address the condition. Temporary BMPs still need to be put in place to minimize or prevent off-site migration of pollutants, especially if a storm event is likely.

#### 5.2.2 Subsequent Action

#### **DEP and/or Facility Personnel**

[1] IF additional action is required,

#### THEN:

- [a] Complete the corrective action (e.g., install a new or modified control and make it operational or complete the repair) before the next storm event or within 14 calendar days from the time of discovery.
- [b] Any corrective action resulting in a change to a stormwater control or procedure documented in the SWPPP requires modification of the SWPPP within 14 calendar days of completing corrective action work.
- [2] <u>IF</u> completion of the corrective action is <u>infeasible</u> within the 14-day timeframe, **THEN**:
  - [a] Document the reasoning in the database.
  - [b] Provide a schedule for completion of the corrective action in the database.

#### NOTE

Completion of the corrective action cannot exceed 45 days from the time of discovery without having to notify EPA. These time intervals are not grace periods, but are schedules considered reasonable for documenting finding(s) and for making repairs and improvements. They are included in the MSGP to ensure that the conditions prompting the need for these repairs and improvements are not allowed to persist indefinitely. In no instance will the corrective action remain open indefinitely (Part 4.3.2 of the MSGP).

#### 5.2.3 Corrective Action Documentation

#### **DEP and/or EPC-CP**

[1] Document existence of any of the conditions listed in Section 5.1 [1] of this procedure in the CAR database within 24 hours of becoming aware of such condition (or if identified late in the work day, by the following work day).

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- [2] Include the following information in the documentation:
  - Description of the condition triggering the need for corrective action review. For any spills or leaks, include the following information:
    - a description of the incident including material, date/time, amount, location, and reason for spill;
    - any leaks, spills or other releases that resulted in discharges of pollutants to waters of U.S., through stormwater or otherwise;
  - Date the condition was identified; and
  - Description of immediate actions taken (Part 4.3.1 of the MSGP) to minimize or prevent the discharge of pollutants. For any spills or leaks, include response actions, the date/time clean-up was completed, notifications made (if any), and staff involved. Also include any measures taken to prevent the reoccurrence of such releases (Part 2.1.2.4 of the MSGP).
- [3] Provide the dates when each corrective action was initiated and completed (or is expected to be completed).
  - [a] If applicable, document why it is infeasible to complete the necessary installations or repairs within the 14-day timeframe, and
  - [b] Document your schedule for installing the controls and making them operational as soon as practicable after the 14-day timeframe.
  - [c] <u>IF</u> EPA must be notified regarding an extension of the 45-day timeframe, **THEN** the DEP must document the rationale for an extension.

#### **EPC-CP MSGP stormwater personnel**

[4] Prepare and submit 45-day exceedance notifications based on information entered into the CAR database by the DEPs.

#### **DEP**

- [5] Ensure that the information in the CAR database is kept up-to-date, to include the following:
  - [a] a thorough description of the nature of the condition requiring corrective action,
  - [b] corrective action(s) taken and/or outstanding,
  - [c] the steps and schedule for completing a corrective action (if not completed within 14 days), and
  - [d] rationale for why the corrective action cannot be completed within 45-days.

#### 5.3 Effect of Corrective Action

When the condition requiring corrective action is a permit violation (e.g., non-compliance with an effluent limit or exceedance of a water quality standard), correcting it does not remove the original

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violation. Additionally, failing to take corrective action in accordance with Part 4 of the MSGP is an additional permit violation.

#### NOTE

The EPA will consider the appropriateness and promptness of corrective action in determining enforcement responses to permit violations (Part 4.5 of the MSGP).

#### 5.4 Substantially Identical Outfalls

When the condition requiring corrective action is associated with an outfall that has been identified as a "substantially identical outfall" (see Parts 3.2.3 and 6.1.1 or the MSGP), a review will assess the need for corrective action for all related substantially identical outfalls. Any necessary changes to control measures that affect these other outfalls will be made before the next storm event if possible, or as soon as practicable following that storm event. Any condition requiring corrective action(s) will be addressed within the timeframes set forth in Part 4.3 of the MSGP (also see Section 5.2 of this procedure).

#### 5.5 Spills

#### **DEP and/or Facility Personnel**

- [1] Clean up all leaks or spills immediately and enter into the CAR database.
  - [a] If the spill is immediately cleaned up, and controls are implemented to prevent further leakage, the condition requiring corrective action can be closed.

#### 5.6 Allowable Non-Stormwater Discharges

The following are allowable non-stormwater discharges authorized by the MSGP:

- Discharges from emergency/unplanned fire-fighting activities;
- Fire hydrant flushing;
- Potable water, including water line flushing;
- Uncontaminated condensate from air conditioners, coolers/chillers, and other compressors and from the outside storage of refrigerated gases or liquids;
- Irrigation drainage;
- Landscape watering provided all pesticides, herbicides, and fertilizer have been applied in accordance with the approved labeling;
- Pavement wash waters where no detergents or hazardous cleaning products are used (e.g., bleach, hydrofluoric acid, muriatic acid, sodium hydroxide, nonylphenols), and wash waters do not come into contact with oil and grease deposits, sources of pollutants associated with industrial activities (see Part 5.2.3 of the MSGP), or any other toxic or hazardous materials, unless residues are first cleaned up using dry clean-up methods (e.g., applying absorbent

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material and sweeping, using hydrophobic mops/rags) and you have implemented appropriate control measures to minimize discharges of mobilized solids and other pollutants (e.g., filtration, detention, settlement);

- Routine external building washdown/power wash water that does not use detergents or hazardous cleaning products (e.g., those containing bleach, hydrofluoric acid, muriatic acid, sodium hydroxide, nonylphenols);
- Uncontaminated ground water or spring water;
- Foundation of footing drains where flows are not contaminated with process materials; and
- Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions
  of your facility, but not intentional discharges from the cooling tower (e.g., "piped" cooling
  tower blowdown or drains).

#### 5.7 Entering a Condition Requiring Corrective Action

To enter a condition requiring corrective action into the CAR database, perform the steps in this section.

Enter clear, complete, and concise language. Correct grammar, punctuation, and spelling errors.

Select the appropriate value from each pull-down menu that applies to the condition requiring corrective action. This information will be used to populate a report that will be submitted to the EPA and is extracted from the database to populate automatic e-mail notifications to managers. Therefore, it is critical that all information entered into the CAR database is correct.

#### **DEP or EPC-CP MSGP stormwater personnel**

- [1] Using internet explorer, access the CAR database at <a href="https://msgp-car.lanl.gov/forms/frmservlet?config=msgp">https://msgp-car.lanl.gov/forms/frmservlet?config=msgp</a> car.
- [2] From the main screen, click on "Enter New Corrective Action."
  - [a] Select the "Corrective Action Header" tab.
  - [b] Enter the following (refer to Attachment 1 for data entry screenshot cross reference to Item numbers in red listed below):
    - Item 1: Name of facility by clicking on the "List" tab and selecting a facility (refer to Attachment 2 for a list of available facilities).
    - Item 2: Date/Time problem was identified (mm/dd/yyyy hh:mm) (the inspection date or the date you first become aware of the issue).

There must be a space between the date (mm/dd/yyyy) and the time (hh:mm).

All dates and times will be entered as mm/dd/yyyy hh:mm in 24-hr (military time) format. Time is tracked to document whether immediate action was taken, whether the issue was documented within 24 hours, and the specific time interval before a corrective action is completed and closed (see Section 5.2 of

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this procedure for corrective action deadlines). Do not leave time as 00:00 (the system default) unless the action occurred at midnight.

- Item 3: Date/Time of Notification to EPC-CP (mm/dd/yyyy hh:mm) (the date the condition is entered into the CAR database or verbal or written notification is provided to the EPC-CP MSGP Program Lead. Conditions reported by verbal or written notification must still be entered into the CAR database.)
  - The existence of any of the conditions listed in Section 5.1 of this procedure must be documented in the CAR database within 24 hours of becoming aware of such condition (or if identified late in the work day, by the following work day).
- Item 4: FOD Responsible for CA (Name & Org) by clicking in the box. FOD
  designations (for example "STO") and the associated name list will pop up.
  Select the appropriate FOD.
  - Contact the EPC-CP MSGP Program Lead at 667-1312 or <a href="https://hbenson@lanl.gov">hbenson@lanl.gov</a> if the FOD name or organization is incorrect, so this can be corrected.
- Item 5: Describe Specific Evaluation Location (for example, "Northeast corner of Building TA-3-66.")
- Item 6: Inspector Z-Number by clicking in the box, which will populate with the Z number of the person who is logged into the database and performing entry. In most instances, the DEP will be identified as the inspector.
- Item 7: Person Identifying Condition Z-Number by clicking in the box, which will populate with the Z number of the person who is logged into the database and peforming entry. If the person identifying the condition is someone other than the inspector, enter that person's Z-number.
  - Any person authorized to conduct work at LANL can identify a potential stormwater issue. If this occurs, they will contact the DEP or EPC-CP MSGP stormwater personnel who will determine if a condition exists that requires corrective action.
- Item 8: Status defaults to "A new corrective action" without making a selection. In the event a condition is entered that is determined to not require corrective action, this status can be changed to "Void" by clicking in the box and selecting from the Status list. The decision to assign a status of "Void" is at the discretion of EPC-CP MSGP stormwater personnel and reserved for EPC-CP use.
- Item 9: If the Status is changed to "Void," enter a clear rationale for voiding the record.
- Item 10: Once all of the above information is entered correctly, click "Save" and go to Step 3.
  - All boxes identified with a red asterisk are "required fields" meaning the form cannot be saved unless these fields are completed. For the purpose of fulfilling

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corrective action documentation requirements (see Section 5.2.3 of this procedure), all applicable fields are required fields.

The system will automatically assign a Corrective Action Report identification (ID) number and move to the "Corrective Action Details" tab.

- [c] Select the "Corrective Action Details" tab.
- [d] Enter the following:
  - Item 11: Identify the condition triggering the need for this review by clicking on the "List" button and selecting the appropriate condition or, if none of the available conditions fit the issue, selecting "Other" and entering a description of the condition (refer to Attachment 2 for a list of available conditions/finding descriptions).

These conditions are described in Section 5.1 of this procedure. Qualified personnel (EPC-CP MSGP stormwater personnel and DEPs) must be knowledgeable of these conditions and select the correct one when entering an issue. If there is uncertainty about which condition applies, refer to the definitions in Section 8.1 of this procedure or contact the MSGP Program Lead at 667-1312 or <a href="mailto:hbenson@lanl.gov">hbenson@lanl.gov</a> for clarification prior to selecting "Other."

- Item 12: If the condition in Item 11 is set to "Other," enter a description of the condition in this field.
- Item 13: Briefly describe the nature of the problem identified during the inspection (e.g., erosion, damage to a BMP, trash, spill, etc.,) and the specific evaluation location (e.g., at TA-60 Roads and Grounds).
  - Spills or other emergency conditions meeting the criteria for corrective action (identified in Parts 4.1 and 4.2 of the MSGP) will require documentation in the CAR database even though the condition was not identified during an inspection.
- Item 14: Enter how the problem was identified by clicking on the "List" button and selecting the appropriate option, or if none of the available options fit, selecting "Other."
- Item 15: If "Other" is selected for Item 14, enter a description of how the problem was identified in this field.
- Item 16: Enter a description of the condition requiring corrective action, or
  identify action to be taken to eliminate or further investigate the problem (e.g.,
  describe modifications or repairs to control measures, work conducted to
  address the condition or to be scheduled in the future, etc.,) or if no
  modifications are needed, the basis for that determination. Include relevant
  dates and facts when updating this field as the corrective action progresses.
- Item 17: Indicate whether the problem was identified at a Substantially Identical Outfall (see Section 5.4 of this procedure) by typing "Y" for yes and "N" for no.

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- Item 18: If the answer to Item 17 is "Y," enter the associated SIO(s) in this field. If the answer to Item 17 is "N," leave this field blank. SIOs are identified in the site-specific SWPPPs. For assistance with identifying SIOs contact the MSGP Program Lead.
- Item 19: If the answer to Item 17 is "Y," describe how the corrective action taken is appropriate for all SIOs (see Section 5.4 of this procedure), document any additional corrective action(s) needed for any of the SIOs, or document why no additional action is needed for the SIOs. If the answer to Item 17 is "N," leave this field blank.
- Item 20: Did/will the corrective action require modification to the SWPPP? Type in "Y" for yes and "N" for no (see Section 5.1 of this procedure for conditions that require SWPPP review and revision).
- Item 21: Date/Time Corrective Action was initiated (mm/dd/yyyy hh:mm).

The duration between the Date/Time problem was identified and Date/Time corrective action was initiated is used to determine whether "immediate action" was taken (see Section 5.2.1 of this procedure). Immediate action is a requirement of the MSGP and therefore, will be documented in accordance with permit requirements.

• Item 22: Date/Time corrective action was completed **OR** expected completion Date/Time (mm/dd/yyyy hh:mm).

If the corrective action has not been completed, enter an expected completion date and time. The system will not allow entry of a date in both locations.

The duration between the Date/Time Problem was Identified and Date/Time corrective action was completed <u>or</u> the Date/Time Problem was identified and expected completion Date/Time is used to determine whether "subsequent action" timeframes and documentation requirements were/are being met, and to forecast where a 45-day exceedance notification to EPA is required (see Section 5.2.3 of this procedure). When information is incorrect or not entered, the MSGP data administrator or Program Lead will contact the originator and request correction(s).

- Item 23: If the corrective action is not or will not be completed within 14 days, provide the status of the corrective action at the end of the 14 day timeframe, the rationale for why it is infeasible to complete the corrective action within 14 days, and describe any remaining steps (including timeframe/schedule associated with each step) necessary to complete the corrective action.
- Item 24: Date EPA notified of intent to exceed 45 Days (mm/dd/yyyy hh:mm) is to be completed by EPC-CP MSGP stormwater personnel to document submittal of notification letter.
- Item 25: Once all of the above information is entered correctly, click "Save" so the corrective action information is retained.

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[3] <u>IF</u> there are additional conditions to enter requiring corrective action, as described in Section 5.1 [1],

**THEN** perform these steps:

- [a] Return to the "Corrective Action Header" tab.
- [b] Click the "Enter New Corrective Action" button in the lower left hand corner of the screen.
- [c] Click "Back to Record Selection" to return to the list of saved conditions requiring corrective action on the initial screen (if desired).

#### 5.8 Updating Corrective Actions

#### **DEP or EPC-CP MSGP stormwater personnel**

- [1] Access the CAR database at <a href="https://msgp-car.lanl.gov/forms/frmservlet?config=msgp">https://msgp-car.lanl.gov/forms/frmservlet?config=msgp</a> car.
  - [a] On the main screen, scroll down to the corrective action number to be edited.
  - [b] Click "Edit."
- [2] Navigate to the desired field, and input the updated information. Most changes will occur relative to updating the status, schedule, and dates of corrective actions.
- [3] Click "Save" to save all changes to the information.

#### 5.9 Validation of Corrective Actions

#### **EPC-CP MSGP stormwater personnel**

- [1] Access the CAR database at <a href="https://msgp-car.lanl.gov/forms/frmservlet?config=msgp">https://msgp-car.lanl.gov/forms/frmservlet?config=msgp</a> car.
- [2] Ensure information entered into the CAR database is correct.
  - [a] Check all entered fields for a condition requiring corrective action to ensure that information is clear, correct, and concise.
  - [b] <u>IF</u> not, <u>THEN</u> notify the DEP of the information that needs to be changed.
  - [c] The DEP is responsible for ensuring all information is validated before generating the annual report.
- [3] <u>IF</u> the identified condition requiring corrective action is a repeat of a previous condition or if it is determined not to be a condition requiring corrective action,

#### THEN

- [a] Under "Status," select "Void."
- [b] The "Void" designation allows MSGP stormwater personnel to manually exclude this information in the annual report.

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#### 5.10 Issues Management

EPC-CP MSGP stormwater personnel or DEPs use the IM tool as the institutional performance issues and tracking system for identified quality assurance (QA) affecting issues. A QA affecting issue includes, but is not limited to, the following conditions.

- Exceedance of a water quality standard.
- Exceedance of an effluent limitation (i.e., at the Asphalt Batch Plant).
- Repeat conditions requiring corrective actions or trends identified by EPC-CP MSGP stormwater personnel.
- Conditions requiring immediate action, where failure to take action would result in pollutants being released to waters of the state.
- Immediate non-compliance with the MSGP.
- Violations identified by the regulatory authority.

The MSGP Program Lead periodically evaluates a summary of open conditions requiring corrective actions in the CAR database. Using the above conditions, the MSGP Program Lead or DEP determines which corrective actions, if any, will be transferred into the IM tool.

#### **DEP or EPC-CP MSGP stormwater personnel**

- [1] <u>IF</u> an issue needs to be entered into the IM tool, <u>THEN</u> send the following information to the EPC Division IMC for entry into the IM tool:
  - Organization responsible for the issue/problem;
  - A description of the nature of the condition identified and what needs to be done to address it;
  - Regulatory citation for the non-compliance;
  - Issues Responsible Manager (IRM);
  - Action, actionee, and due date for each issue; and
  - Whether the issue was identified internal or external to LANL.

#### 5.11 Notifications for New and Overdue Corrective Actions

- [1] When a new condition requiring corrective action is entered into the CAR database, the FOD, Ops Manager, DESH Manager, inspector (usually the DEP) and EPC-CP MSGP stormwater personnel and managers are notified automatically by e-mail on the evening of the day the corrective action was entered.
- [2] Automated e-mail notifications will be sent during the corrective action process depending on the length of time it will take to close.
- [3] A notification will be sent out:

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- When a new corrective action is entered into the database (see Attachment 3);
   and
- Weekly notifications of outstanding (open) corrective actions (see Attachment 4).

Each notification contains a hyperlink to a web-based report containing a list of all open issues and timeline status where final corrective actions have not been completed (see Attachment 5) by the FOD. The report contains the FOD, Facility, unique Corrective Action identification number assigned by the CAR database, the person identifying the condition, the date the issue was identified, the date corrective action was initiated, the projected completion date, and a color-coded count (corresponding to the Corrective Action deadlines in Section 5.2 of this procedure) of the number of days to take action and the number of days the issue has been open, and the issue/problem description.

These notifications serve to apprise recipients of the status of open conditions requiring corrective actions and to provide sufficient time for MSGP stormwater personnel to provide documentation to EPA at the 45-day deadline. This will assist the FOD, DESH Managers, Ops Managers, and the DEPs with keeping track of conditions requiring corrective actions.

#### 6.0 TRAINING

The following personnel require training before implementing this procedure:

- EPC-CP Group Leader and Team Leader;
- EPC-CP MSGP stormwater personnel;
- DEPs; and
- Other LANL or subcontract personnel identified as being required to conduct stormwater inspections, or other assessments and enter conditions requiring corrective actions into the CAR database as part of their job duties.

For EPC-CP MSGP stormwater personnel, the training method for this procedure is "self-study" (reading). DEPs shall achieve a satisfactory score on Training Course 53040, MSGP Routine Facility Inspections OJT. Other participating groups may require training documentation pursuant to local procedures.

Personnel performing this procedure will be familiar with the most current version of the following procedure:

ENV-CP-QAPP-MSGP, Multi-Sector General Permit for Industrial Activities Program

#### 7.0 RECORDS

Conditions requiring corrective actions are contained within the CAR database. DEPs will retain documentation substantiating these conditions, corrective actions, and timelines reported in the CAR database (e.g., e-mails, FSRs, Work Orders, etc., as appropriate). These documents shall be made available to EPC-CP upon request.

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#### 8.0 DEFINITIONS AND ACRONYMS

See LANL Definition of Terms.

#### 8.1 Definitions

**Best Management Practice (BMP)**—Schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of "waters of the United States." BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. (40 CFR Part 122.2)

**Control Measure**—Any BMP or other method (including effluent limitations) used to prevent or reduce the discharge of pollutants to waters of the United States.

**Numeric effluent limitation**—The degree of effluent reduction attainable by the application of the best practicable control technology currently available (see 40 CFR Part 443.12). For LANL, numeric effluent limitations apply only to the Asphalt Batch Plant (Sector D) (see Table 1-1 of the MSGP). Constituents with limitations for Sector D include Total Suspended Solids, pH, and oil and grease (see Table 8.D-2 of the MSGP).

**Note:** Exceedance of a numeric effluent limitation is a violation of the MSGP (see Part 4.1 of the MSGP).

**Non-numeric effluent limitations**—Per Part 2.1.2 of the MSGP, these include minimizing exposure, good housekeeping, maintenance, spill prevention and response, erosion and sediment controls, management of runoff, salt storage controls, employee training, elimination of non-stormwater discharges, and minimizing dust generation and vehicle tracking of industrial materials.

**Unauthorized release or discharge**—The release of any liquid or solid substance (within the boundary of an MSGP site) that is not an allowable non-stormwater discharge (see Section 5.6). Examples are hydraulic oil, gasoline, diesel, powdered concrete, concrete washout, steam condensate line leaks, etc.

**Impaired water quality exceedance**—Exceedance of a New Mexico water quality standard. These standards are specified in the New Mexico Administrative Code, Title 20, Chapter 6, Part 4, *Standards for Interstate and Intrastate Surface Waters*.

**Note:** Industrial stormwater discharges must be controlled as necessary to meet applicable water quality standards within the State of New Mexico (see Part 2.2.1 of the MSGP).

#### 8.2 Acronyms

See LANL Acronym Master List.

ВМР	Best Management Practice
CA	Corrective Action
CAR	Corrective Action Report
EPA	Environmental Protection Agency

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EPC-CP	Environmental Protection and Compliance-Compliance Programs
DEP	Deployed Environmental Professional
DESH	Deployed Environmental, Safety and Health
ID	Identification
IM	Issues Management
IMC	Issues Management Coordinator
IRM	Issues Responsible Manager
IWD	Integrated Work Document
FOD	Facility Operations Director
FSR	Facility Service Request
HEY	Heavy Equipment Yard
LANL	Los Alamos National Laboratory
MSGP	Multi-Sector General Permit
N	No
NPDES	National Pollutant Discharge Elimination System
Ops	Operations
P	Procedure
PD	Program Description
QA	Quality Assurance
QP	Quality Procedure
SD	System Description
STO	Science and Technology Operations
SWPPP	Stormwater Pollution Prevention Plan
40 CFR	Title 40 of the Code of Federal Regulations
WMC	Waste Management Coordinator
Υ	Yes

#### 9.0 REFERENCES

- Final National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Industrial Activities. Federal Register: June 16, 2015, Volume 80, Number 115.
- <u>Unites States Environmental Protection Agency (EPA) National Pollutant Discharge</u>
   Elimination System (NPDES) Multi-Sector General Permit For Stormwater Discharges
   Associated With Industrial Activity (MSGP)
- Los Alamos National Laboratory Storm Water BMP Manual

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- PD100, DOE/NNSA Approved Los Alamos National Laboratory 10 CFR 857 Worker Safety and Health program Description
- <u>SD100, Integrated Safety Management System</u>
- P101-18, Procedure for Pause/Stop Work
- EPC-CP-QP-023, MSGP Routine Facility Inspections

#### 10.0 ATTACHMENTS

Attachment 1: Screenshot Example of CAR Database

Attachment 2: Lists of Limited Values in the CAR Database

**Attachment 3:** Example New Corrective Action Finding Notification

Attachment 4: Example Weekly Notification of Outstanding Corrective Action Findings

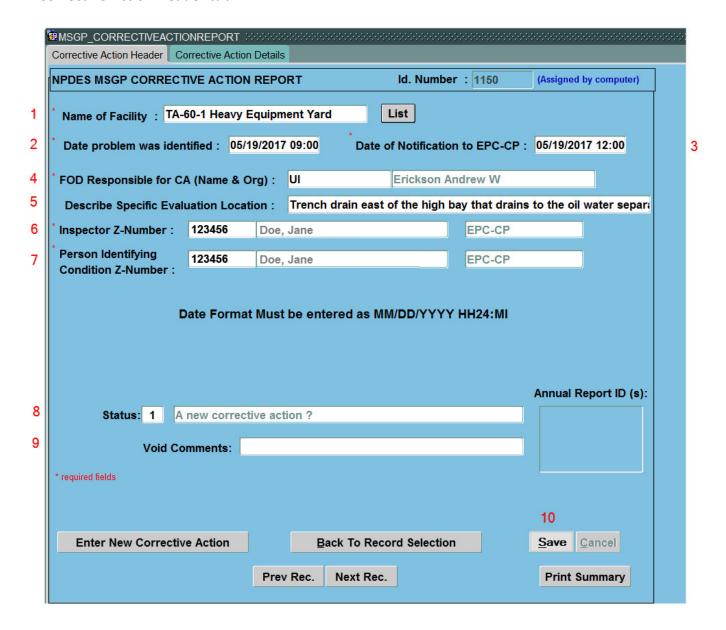
**Attachment 5:** Example Outstanding Corrective Action Report

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#### Attachment 1 - Screenshot Example of CAR Database

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#### **Corrective Action Header tab**



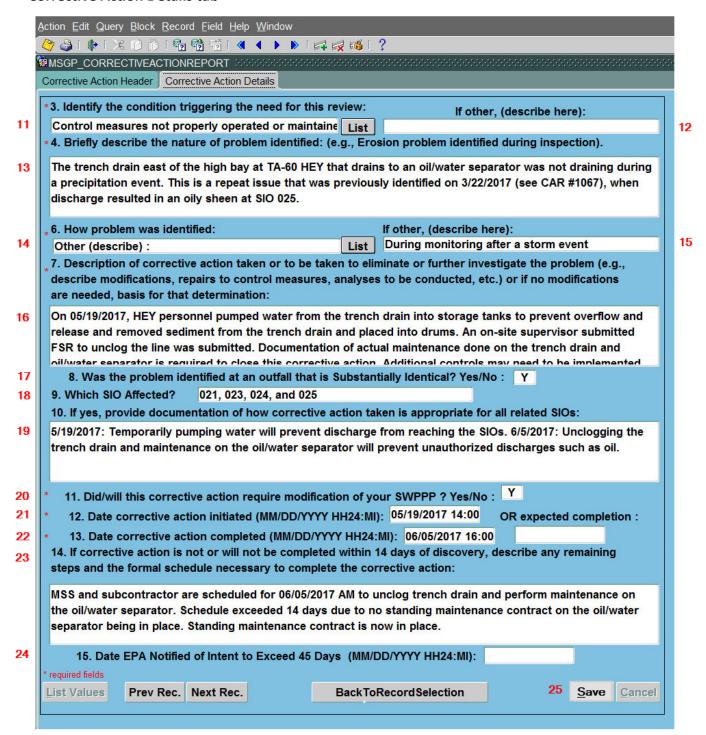
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#### Attachment 1 - Screenshot Example of CAR Database (cont.)

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#### **Corrective Action Details tab**



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#### Attachment 1 – Screenshot Example of CAR Database (cont.)

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#### Full Text for Item 16: Description of Corrective Action Taken or to be Taken

On 05/19/2017, HEY personnel pumped water from the trench drain into storage tanks to prevent overflow and release. Sediment was also removed from the trench drain and placed into drums. An on-site supervisor submitted an FSR to unclog the line. Documentation of actual maintenance done on the trench drain and oil/water separator is required to close this corrective action. Additional controls may need to be implemented until maintenance is complete to ensure that oil is not discharged into the drainage channel north of the site. In addition, the SWPPP must be modified to identify the preventative maintenance schedule and include the procedure for conducting it. On 05/30/2017, the SWPPP was modified to include a quarterly maintenance schedule and a procedure for routine maintenance on the oil/water separator. On 06/05/2017, MSS jet-routed the drain to remove the clog and a subcontractor performed maintenance on the oil/water separator.

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#### Attachment 2 - Lists of Limited Values in the CAR Database

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#### Name of Facility (Item 1 on Attachment 1 Screenshot)

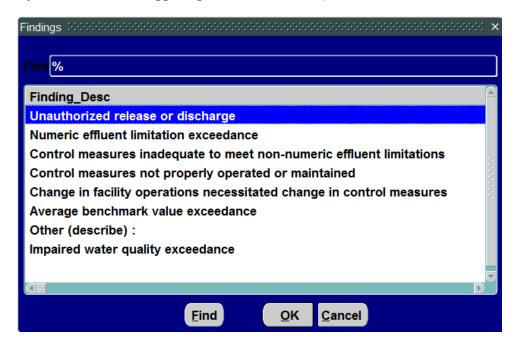


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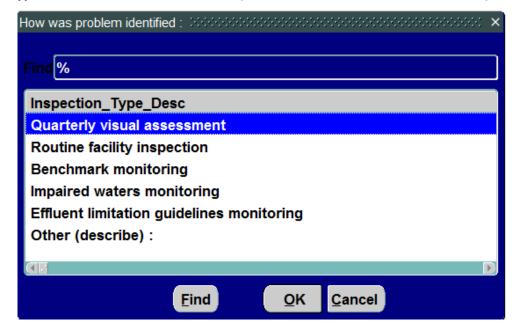
## Attachment 2 – Lists of Limited Values in the CAR Database (cont.)

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Finding Description/Condition Triggering Need for Review (Item 11 on Attachment 1 Screenshot)



Inspection Type/How Problem was Identified (Item 14 on Attachment 1 Screenshot)



#### **MSGP Corrective Actions**

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#### Attachment 3 - Example New Corrective Action Finding Notification

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 $\label{lem:main_solution} From: MSGPC or rective Action DB@esp-esh-as 01. lanl. gov [mail to: MSGPC or rective Action DB@esp-esh-as 01. lanl. gov] \\ \textbf{Sent: Friday, January 19, 2018 10: 00 PM}$ 

To:

Cc:

Subject: New Corrective Action finding relative to the NPDES MSGP Program

This email is generated automatically by the National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit (MSGP) Corrective Action Report (CAR) database to provide notification of discovery of a new condition requiring corrective action. As the recipient of this notification, you are responsible for immediately taking all reasonable steps necessary to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational.

"Immediately" requires initial action on the same day a condition is found. However, if a problem is identified at a time in the work day when it is too late to initiate corrective action (after 2 P.M.), the initiation must begin no later than the following work day.

Documentation of newly identified conditions requiring corrective action must occur within 24 hours of discovery, evidenced by entry into the

At TA-50-37 WCRRF on 01/17/18, a condition requiring a corrective action was observed and a corrective action report was generated per the 2015 Multi-Sector General Permit requirements for stormwater controls at industrial sites. The condition(s) requiring a corrective action(s) is/are listed below.

CA#: 1296 located at TA-50-37 WCRRF.

Person Identifying Condition: DOE JANE

Description of finding: Unauthorized release or discharge

Condition requiring corrective action: Forklift was leaking hydraulic fluid

Description of the corrective action taken or to be taken to eliminate the condition or further investigation: On 1/17/2018 prior tot he start of work the operator noticed the forklift was leading hydraulic fluid from the line to the mast. Approximately 4 to 6 oz leaked onto the asphalt. The Operation Center was notified and the WMC and ENV. The Nuc Operators placed spill pads under the leak. FSR#182723 was entered to repair forklift and apply microblaze. At 1702 MSS personnel applied micro blaze to the spill. On 1/18/2018 the WMC collected all spill pads and managed them accordingly.

Status: The corrective action was initiated on 01/17/2018 and was completed on 01/17/2018.

Click <u>HERE</u> to access the list of MSGP corrective action(s) not yet completed for EWMO.

Click  $\underline{\mathsf{HERE}}$  to access the list of all MSGP corrective action(s) not yet completed

The ESH Deployed Environmental Professional (DEP) assigned to your organization/area is (are) Jane Doe.

The color legend on the linked reports corresponds to the following schedule for corrective action completion as required by the 2015 MSGP:

#### You must complete the corrective action within 14 calendar days of discovery

If completion of final corrective actions within 14 days is not feasible, the reason(s) must be documented and a description of steps required and formal schedule for completion, which must be done as soon as practicable after the 14-day timeframe, but not longer than 45 days after discovery. The reasons, steps and schedule for completion must be entered into the CAR database.

If the completion of corrective action will exceed the 45-day timeframe, you make take the minimum additional time necessary, provided that you notify Region 6 of the Environmental Protection Agency:

- of your intent to exceed 45 days,
- · your rationale for an extension, and
- a completion date.

To assist the preparation of this notification, as a responsible individual, you must contact the EPC-CP Project Lead at 667-1312 for any corrective action that remains open 35 days or more, and provide a formal status of the progress for each corrective action. By day 40, the DEP must provide the EPC-CP Project Lead the rationale for potentially exceeding the required 45-day timeframe and a proposed completion date for each associated corrective action. The DEP must also amend the rationale and completion date in the CAR database.

An extension request must be submitted to Region 6 of the U.S. Environmental Protection Agency by EPC-CP personnel prior to day 45 for final corrective actions not completed or estimated to be completed within 45 days of discovery.

The responsible individual must ensure compliance with the proposed completion schedule.

These intervals are not considered grace periods, but are defined schedules to ensure the conditions requiring corrective action do not persist indefinitely.

Where corrective actions result in changes to controls or any procedures documented in the facility's Storm Water Pollution Prevention Plan (SWPPP), the DEP must modify the SWPPP accordingly within 14 calendar days of completing corrective action work.

#### **MSGP Corrective Actions**

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#### Attachment 4 - Example Weekly Notification of Outstanding Corrective Action Findings

Page 1 of 1

 $\textbf{From:} \ MSGPC or rective Action DB@esp-esh-as 01.lanl. gov \ [mail to: MSGPC or rective Action DB@esp-esh-as 01.lanl. gov] \ [mail to: MSGPC or rective Action DB@esp-esh-as 01.lanl. gov$ 

Sent: Monday, January 01, 2018 10:00 PM

To: Cc:

Subject: Weekly Notification of Outstanding NPDES MSGP Corrective Action finding(s)

This email is generated automatically by the National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit (MSGP) Corrective Action Report (CAR) database to provide notification of discovery of a new condition requiring corrective action. As the recipient of this notification, you are responsible for immediately taking all reasonable steps necessary to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational.

"Immediately" requires initial action on the same day a condition is found. However, if a problem is identified at a time in the work day when it is too late to initiate corrective action (after 2 P.M.), the initiation must begin no later than the following work day.

Documentation of newly identified conditions requiring corrective action must occur within 24 hours of discovery, evidenced by entry into the CAR database.

At TA-3-38 Carpenter Shop, 1 total MSGP stormwater corrective action(s) has (have) not been completed.

At TA-3-38 Metals Fab. Shop, 1 total MSGP stormwater corrective action(s) has (have) not been completed.

At TA-60-1 Heavy Equipment Yard, 7 total MSGP stormwater corrective action(s) has (have) not been completed.

At TA-60-2 Warehouse, 4 total MSGP stormwater corrective action(s) has (have) not been completed.

Click HERE to access the list of MSGP corrective action(s) not yet completed for UI.

Click HERE to access the list of all MSGP corrective action(s) not yet completed.

The ESH Deployed Environmental Professional (DEP) assigned to your organization/area is (are) Jane Doe : John Doe.

The color legend on the linked reports corresponds to the following schedule for corrective action completion as required by the 2015 MSGP:

#### You must complete the corrective action within 14 calendar days of discovery.

If completion of final corrective actions within 14 days is not feasible, the reason(s) must be documented and a description of steps required and formal schedule for completion, which must be done as soon as practicable after the 14-day timeframe, but not longer than 45 days after discovery. The reasons, steps and schedule for completion must be entered into the CAR database.

If the completion of corrective action will exceed the 45-day timeframe, you make take the minimum additional time necessary, provided that you notify Region 6 of the Environmental Protection Agency:

- of your intent to exceed 45 days,
- your rationale for an extension, and
- a completion date.

To assist the preparation of this notification, as a responsible individual, you must contact the EPC-CP Project Lead at 667-1312 for any corrective action that remains open 35 days or more, and provide a formal status of the progress for each corrective action. By day 40, the DEP must provide the EPC-CP Project Lead the rationale for potentially exceeding the required 45-day timeframe and a proposed completion date for each associated corrective action. The DEP must also amend the rationale and completion date in the CAR database.

An extension request must be submitted to Region 6 of the U.S. Environmental Protection Agency by EPC-CP personnel prior to day 45 for final corrective actions not completed or estimated to be completed within 45 days of discovery.

 $The\ responsible\ individual\ must\ ensure\ compliance\ with\ the\ proposed\ completion\ schedule.$ 

These intervals are not considered grace periods, but are defined schedules to ensure the conditions requiring corrective action do not persist indefinitely.

Where corrective actions result in changes to controls or any procedures documented in the facility's Storm Water Pollution Prevention Plan (SWPPP), the DEP must modify the SWPPP accordingly within 14 calendar days of completing corrective action work.

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# **Attachment 5 – Example Outstanding Corrective Action Report**

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# EPC-CP MultiSector General Permit (MSGP) Corrective Action Report Findings Final Corrective Actions Not Yet Complete (as of 02/01/2018)

FOD	RAD	MSGP Facility	CA#	Person Identifying Condition	Date Problem Identified	Corrective Action Initiated Date	Days to Take Action	Completion		Days Open (since	EPA Notified of Intent to Exceed 45 Days	Problem Description
UI	DOE JOHN	TA-3-38 Carpenter Shop	1298	DOE JANE	01/31/18		!	02/02/18	1	1		Tarp was totally torn off of the stack of metal posts at the southwest corner of the storage yard.
	DOE JOHN	TA-3-38 Metals Fab. Shop	1299	DOE JANE	01/31/18		·!	02/02/18	1	1		A pile of gravel (from a torn gravel bag) is directly east of the trench drain.
Total	Total Findings:							2				

Legend					
į.	Action must be taken and documented in CAR.	3	Indicates immediate action was not taken (i.e., <=2 days of discovery)		
	Within 14 days of discovery		Between 35 and 44 days of discovery		
	Between 15 and 34 days of discovery		45 days of discovery or greater		

ATTACHMENT 18: EPC-CP-QP-064, MSGP STORMWATER VISUAL ASSESSMENTS

EPC-CP-QP-064	Revision: <b>1</b>	
Effective Date: 10/09/2018	Next Review Date: 10/09/2021	

EPC-CP

Organization:

Organization:

EPC-CP Team Leader

**EPC-CP Group Leader** 

Holly L. Wheeler

Terrill W. Lemke

Responsible Line Manager:

Responsible Line Manager:

Taunia S. Van Valkenburg



# Environment, Safety, Health Directorate Environmental Protection and Compliance-Compliance Programs Quality Procedure

# **MSGP Stormwater Visual Assessments**

#### **Document Owner:** Name: Organization: Signature: Date: Holly L. Wheeler EPC-CP Signature on File 9-11-18 Derivative Classifier: Unclassified or [ Organization: Name: Signature: Date: **Jacob Meadows** EPC-CP Signature on File 9-11-18 **Approval Signatures:** Subject Matter Expert: Organization: Signature: Date:

This copy is uncontrolled.

10-9-18

9-11-18

9-12-18

Date:

Date:

Users are responsible for ensuring they work to the latest approved version. To document a required read, Login to UTrain, and go to the Advanced Search.

Signature on File

Signature on File

Signature on File

Signature:

Signature:

<b>MSGP</b>	<b>Stormwater</b>	Visual
Assess	ments	

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# **REVISION HISTORY**

Document Number and Revision [Include revision number, beginning with Revision 0]	Effective Date [Document Control Coordinator inserts effective date]	Description of Changes [List specific changes made since the previous revision]
ENV-RCRA-QP-064, R0	7/09	New document <i>MSGP Storm Water Visual Inspections</i> .
ENV-RCRA -QP-064, R1	3/10	Clarifications and added attachments.
ENV-RCRA -QP-064, R2	2/12	Biennial review/revision
EPC-CP-QP-064, R0	10/04/2017	This document replaces ENV-RCRA-QP-064 R2. Converted into new format, and new organization name, clarified steps, updated attachments.
EPC-CP-QP-064, R1	10/09/2018	Removed requirement to conduct visual assessment on filtered samples. Updated form to match text.

# MSGP Stormwater Visual Assessments

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#### 1.0 INTRODUCTION

Los Alamos National Laboratory (LANL) through Environmental Protection and Compliance-Compliance Programs (EPC-CP) conducts stormwater monitoring activities required pursuant to the National Pollutant Discharge Elimination System (NPDES), Multi-Sector General Permit (MSGP). The MSGP requires LANL to monitor stormwater runoff from industrial sites relative to potential pollutants.

#### 1.1 Purpose

This procedure describes the process for conducting visual assessments of stormwater from outfall locations where LANL conducts stormwater monitoring activities under the MSGP.

#### 1.2 Scope

Requirements set forth in this document apply to LANL industrial facilities covered by the MSGP. These facilities include, a warehouse, several metal fabrication areas/shops, a heavy equipment yard, an asphalt batch plant, roads and grounds, a foundry, a power plant, a material recycling facility and a carpenter shop. Inspection waivers may be granted by EPC-CP for adverse weather conditions and unstaffed or inactive sites.

At least once each MSGP monitoring quarter an unfiltered stormwater sample must be collected from each discharge point covered by the MSGP and site specific Storm Water Pollution Prevention Plan (SWPPP) and visually inspected for water quality characteristics. Stormwater samples are collected with an automated sampler, single stage sampler, or by taking a grab sample.

Assessments conducted under this procedure are documented using the Maintenance Connection Express™ (MC Express) web application on a tablet or notebook style computer. In the event of electronic hardware or web application failure, personnel may use a printed hard copy to document the work.

#### 1.3 Applicability

This procedure applies to the EPC-CP technical staff and subcontractor personnel (as applicable) who conduct stormwater visual assessments during or after measurable storm events at MSGP outfalls.

**Note:** A measurable storm event is identified in section 6.1.3 of the MSGP as one "that results in an actual discharge from your site that follows the preceding measurable storm event by at least 72 hours (three days)."

#### 2.0 PRECAUTIONS AND LIMITATIONS

Hazards in the work described in this procedure are controlled through site specific Integrated Work Documents (IWDs). The hazard level for the activities described in this procedure is <u>low</u>. The IWD Part II (2101 Form) will address site-specific requirements and training for Facility Operations Divisions (FODs).

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Work may be discontinued during periods or conditions that make sites dangerous for worker safety or prevent personnel from safely accessing sites (e.g., weather-related events such as flash floods, flooding, lightning, wildfires, hail, icy roads, deep snow, or LANL operations such as firing shots or burns).

Some terminology varies between the MC Express software and the Maintenance Connection desktop software.

- The "Reading" field in MC Express is the same field as "Reading Final" in Maintenance Connection desktop and "Meas." on a hard copy (printed) work order.
- The "Complete" option in MC Express is the same as a "Yes" answer; the "Failed" option in MC Express is the same as a "No" answer. Maintenance Connection desktop and hard copy (printed) work orders use "Yes" and "No" terminology.

#### 3.0 PREREQUISITE ACTIONS

#### 3.1 Planning and Coordination

- 1. Schedule work to be completed by the target date appearing on the work order(s) or as requested by the MSGP Program Lead if a form is not issued.
- 2. Obtain necessary additional paperwork (if required) before conducting this work, including IWD's, and excavation permits.
- 3. As specified in the IWD, inform (e.g., by e-mail) facility contacts and/or DEP (Deployed Environmental Professional) of the schedule for work and locations up to a week (preferred) before but no later than the day before (for minor changes) so work is added to the appropriate plan of the day.

**Note:** For some FODs (e.g., Utilities and Institutional Facilities), MSGP stormwater monitoring activities are on a standing plan of the day. However, this must be requested each year at the beginning of the monitoring season.

- 4. The IWD Part II (2101 Form) addresses specific requirements and training for FODs.
- 5. Gather the required equipment (see Section 3.2) for the work to be done.
- 6. Using the Safari or Chrome web browser on a tablet or notebook style computer, navigate to http://express.maintenanceconnection.com and select English from the available dropdown menu.
- 7. Log into the MC Express application using your login credentials. Confirm that the work order list displayed in the "My Open Work Orders" section matches your sites. If work orders are not displayed, click the "Refresh" bar at the bottom of the page. The page will refresh and any work orders issued since you logged in will be loaded to the application. If the work order lists still do not match, contact the MSGP Data Management Team for clarification.

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8. Ensure that field personnel have access to accurate time measurement at the Site. When at the site, the clock time on the ISCO sampler must be set to Mountain Standard Time at all times, with no daylight saving time adjustment.

#### 3.2 Tools and Equipment

Ensure the following equipment is available in the field vehicle:

- Safety glasses with side shields
- Nitrile gloves
- Sturdy hiking boots or steel toed shoes with soles that grip and other facility specific Personal Protective Equipment
- Cell phone (only government cell phones are allowed in secure areas) (See <a href="https://int.lanl.gov/policy/documents/P217.pdf">https://int.lanl.gov/policy/documents/P217.pdf</a> for requirements for using portable electronic devices on Laboratory property.)
- Current copy of this procedure
- Current copy of the IWD(s)
- Current copy of the MSGP Sampling and Analysis Plan
- Site Map(s) (as needed)
- Current electronic work order or paper inspection form
- Government issued electronic tablet with Safari web browser and Blackberry UEM<sup>TM</sup> app. (See <a href="https://int.lanl.gov/policy/documents/P217.pdf">https://int.lanl.gov/policy/documents/P217.pdf</a> for requirements for using portable electronic devices on Laboratory property.)
- Necessary access and station keys
- Certified clean replacement sample bottles (clear glass or clear poly)
- Paper Towels

#### 4.0 VISUAL ASSESSMENT OF STORMWATER

1. Take the sample bottle with water out of automated sampler or single stage jar off the ground, or fill a clear sample bottle with a grab sample and wipe off exterior.

**Note:** If a grab sample is collected, it will be collected during daylight hours in a wide mouth clear glass or plastic container within 30 minutes of discharge from a storm event.

- 2. In MC Express, click on the appropriate work order number to open the work order. The work order will open in the display to the work order Summary page.
- 3. Click on the "Tasks" bar to navigate to the work order Tasks page. See MC Express screen shot examples in Attachment 1 and a hard copy example in Attachment 2.

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- 4. Any additional comments not documented in the "Reading" field will be entered in the "Comments" field of the same task line. If the inspector needs more space, additional comments will be entered in the "Labor Report Update" field (see Section 4.3) when the work order is updated to "Complete" status.
- 5. Click the "Save" bar after all entries for a task line have been completed and before proceeding to the next question. Failure to "Save" results in lost data entries.

#### 4.1 Documenting Sample Information

Each item number listed in red font below corresponds to a red numbered box on both screenshots (Attachment 1) and hard copy format (Attachment 2).

 Item 1: Document the monitoring period by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe the monitoring period (e.g., Apr-May, Jun-Jul, Aug-Sep, and Oct-Nov).

**Note:** If the discharge collected is from a rain event from the previous monitoring period but the visual assessment is made in the following monitoring period, document monitoring period on the inspection to correspond to the period in which the rain event took place.

Item 2: Check the date and time stormwater discharge began and document by clicking the
expand arrow located on the right side of the task line and changing the "Complete" or
"Failed" line to "Yes".

Enter the date and time in the following date formats: MM/DD/YY, or MM-DD-YY. Time must be entered in 24-hr format.

**Note**: If the discharge date/time is not available (e.g., precipitation report) when the visual is performed in the field, leave this Task Line incomplete and complete when the information is available.

3. Item 3: Check the date and time the sample was collected and document by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes".

Enter the date and time in the following date formats: MM/DD/YY, or MM-DD-YY. Time must be entered in 24-hr format.

**Note:** If the collection date/time is not available (e.g., precipitation report) when the visual is performed in the field, leave this Task Line incomplete and complete when the information is available.

4. Item 4: Check the date and time stormwater was visually assessed and document by clicking on the right side of the task line and changing the "Complete" or "Failed" line to "Yes".

Enter the date and time in the following date formats: MM/DD/YY, or MM-DD-YY. Time must be entered in 24-hr. format.

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5. Item 5: Observe the nature of the discharge and document by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe the discharge (e.g., rainfall or snowmelt) and the TOTAL amount of precipitation from the event.

**Note:** If the total amount of precipitation is not available (e.g., precipitation report) when the visual is performed in the field, leave this Task Line incomplete and complete when the information is available.

6. Item 6: Check the sample was collected in the first 30 minutes of discharge and document by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes. The field inspector will document the reason a sample could not be collected within the first 30 minutes.

#### 4.2 Assessing Parameters

While conducting the visual examinations, personnel will constantly be attempting to relate any pollutant that is observed in the sample to a pollutant source on the site.

If there are any potential sources of pollutants on site, document the following, and contact the EPC-CP MSGP Project Lead within 24 hrs. of identification.

- Potential sources;
- Indicate if there are any Best Management Practices (BMPs) on site and evaluate and note effectiveness; and
- If no BMPs, determine if installation could correct future pollutant migration.
- 7. Item 7: Observe the color of the discharge in the sample container and document by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe the color.
- 8. Item 8: Observe any odors detected from sample and document by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe the odor (e.g., musty, sewage, sulfur, sour, solvents, petroleum/gas, etc.).
- 9. Item 9: Observe the clarity of the discharge and document by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe the clarity (e.g., slightly cloudy, cloudy, opaque).

Clarity is described as the depth in which you can look into or through water. For example, an individual can see through a clear glass of clean water in daylight. Generally, the clarity of the water is a good visual indicator of the purity of water. If the water is poor in clarity there is most likely suspended solids throughout the water.

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- 10. Item 10: Observe any floating solids and document by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Careful examination will determine whether the solids are raw materials (e.g., product used to fabricate something, or ingredients used in a formulation) or waste materials (e.g., shavings, woodchips and sawdust, trash). Describe any floating solids observed.
- 11. Item 11: Observe any settled solids in the sample and document by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe any settled solids observed (e.g., fine, course).
  - Settled solids may be an indicator of unstable ground cover combined with a high intensity stormwater runoff event.
- 12. Item 12: Observe any suspended solids in the sample and document by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe any suspended solids observed (e.g., fine, course).
  - Most often suspended solids include fine sediment. This may be an indication of an unstable channel with eroding banks. Some water appears to be colored because of relatively coarse particulate material in suspension such as sediment.
- 13. Item 13: Check the sample is free of foam and document by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Gently shake the sample container. Describe any bubbles in or on the surface of the water and the color of the foam.
  - If it is determined that foam is caused by a pollutant, complete the visual assessment and contact the EPC-CP MSGP Project Leader <u>immediately</u> following completion of the <u>assessment</u>. Follow-up action is required within 24 hours.
- 14. Item 14: Check the sample is devoid of any oil sheen and document by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". If an oil sheen is present, describe the thickness and consistency (e.g., flecks, globs).
  - If an oil sheen is present, contact the EPC-CP MSGP Project Leader <u>immediately</u> following <u>completion of the visual assessment</u>. Determine the nature of the discharge (rain, snow, hail), the source of the oil sheen and if existing BMPs are effective in mitigation of potential pollutants or if a new BMP needs to be installed. Follow-up action is required within 24 hours.
- 15. Item 15: Check the discharge is free of any other indicators of stormwater pollution not described in any other task line above and document by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe any observations.
- 16. When all task lines have been completed, click the "Back" button in the upper left hand corner to exit the work order Tasks page and return to the work order Summary page.

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#### 4.3 Completing the Assessment Form

- 1. Ensure the inspection form has been filled out completely including information not available during the field inspection (e.g., date/time of discharge, date/time of sample collection, total precipitation amount).
- 2. Click the checkered flag in the upper right corner of the work order Summary page.

  The work order will open in the display to the Status Update page.

MC Express automatically changes the work order status to "Closed" and auto populates the date/time fields.

- 3. Item 16: Click on the expand arrow located on the right side of the "New Status" field and select "Completed" from the available dropdown menu. Ensure the date and time autopopulated are the date and time the work was completed and not the date/time the form was filled out. If work needs to be performed over multiple days, enter the date and time the work began in the Labor Report field. To update the date or time, click the "Date" field and make necessary adjustments using the available timestamp application. Click "Set" to apply changes.
- 4. Item 17: The inspector enters/prints his/her name in the "Labor Report Update" field.

Any additional notes, observations, or site conditions not documented in a task line "Reading" or "Comments" field will be documented in the "Labor Report Update" field.

- 5. Scroll down the page to the "Signature" bar and click the expand arrow on the left side of the bar to open the "Signature" field.
- 6. Item 18: Capture an electronic signature by drawing with a finger on the tablet screen. The Lead Inspector is certifying that the information submitted is "true, accurate, and complete" by electronically signing the work order.

**Note:** If using MC Express on a desktop screen (not a tablet), the mouse must be used to sign electronically.

- 7. Click on the "Save" bar at the bottom of the page to close the "Signature" field.
- 8. Click on the "Back" button in the upper left hand corner to return to the "My Open Work Orders" page.
- 9. Once you have completed an inspection, click on the Menu button again, and then click the "Logout" bar. Close the browser. All work will automatically upload from the MC Express application to the MC database.

Always log out of MC Express when you have finished work OR if work is interupted.

#### 4.4 Completing the Certification Statement

1. Using the Safari web browser on a desktop computer, navigate to <a href="http://www.maintenanceconnection.com">http://www.maintenanceconnection.com</a>. Log into the MainConn desktop application using your login credentials.

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- 2. Click "Open" in the tool bar at the top of the page to open the MainConn module selections. Click on the "Work Orders" module. See Attachment 3 for screenshot examples of printing from MainConn.
- 3. Click on the "Search" tab at the top left of the page and enter the work order number in the "Search Value" field. Click the arrow to the right of the "Search Value" field to open the work order in the right split screen.
- 4. Click on the "Report" tab at the top of the page and click the "Work Order Statement" subtab.
- 5. Click the Tools drop down menu in the top right corner of the page and select "Print" from the options. The print dialog box will open. Select the print options as appropriate for your local printer.
- 6. Item 19: Obtain a printed name and title, signature, and date on the certification statement (see Attachment 2). The visual assessment form must be certified with a signature from a manager that meets the definition of a signatory in MSGP Permit Section B.11.A (e.g., FOD, Operations Manager; Deployed Environmental, Safety, and Health Group Leader; EPC Group Leader, EPC-CP Team Leader). The manager is certifying the information submitted is "true, accurate, and complete" by signing the form.
  - EPC-CP will send out completed visual assessment forms at the end of each quarter that will contain a certification statement in the cover memorandum. The duly authorized signatory may sign and date this certification statement rather than the certification line associated with each attached form. However, the memorandum and associated completed forms must remain together.
- 7. Place the completed and signed visual assessment into the facility SWPPP.

#### 5.0 EVIDENCE OF STORMWATER POLLUTION

If stormwater contamination is identified through visual assessment personnel will attempt to identify the pollutant source. Personnel will evaluate whether or not BMPs have already been implemented and evaluate whether or not these are working correctly or need maintenance. A design change could also be incorporated into the stormwater pollution prevention plan to eliminate or minimize the contaminant source from occurring in the future. Personnel will evaluate whether or not implementation of additional BMPs are needed in the pollution prevention plan to address the observed contaminant.

A cleanup of the site should be conducted if the pollutant source is known and well defined. The FOD, DEP, and MSGP representative of EPC-CP should also be contacted and made aware of the situation.

Refer to EPC-CP-QP-022, MSGP Corrective Actions.

#### 6.0 TRAINING

The following personnel require training before implementing this procedure:

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EPC-CP technical staff and subcontract or other personnel who retrieve stormwater samples
and conduct visual assessments at automated samplers, single stage stormwater samplers,
or by grab sample for the MSGP.

For EPC-CP staff, the training method for this procedure is "self-study" (reading). Other participating groups may require training documentation pursuant to local procedures.

Personnel performing this procedure will be familiar with the most current versions of the following procedures and operation manuals:

• EPC-CP MSGP Sampling and Analysis Plan for the current monitoring year

#### 7.0 RECORDS

Records generated by this document and signed by the EPC-CP certifier will be submitted to the EPC-CP Records Management designated point of contact or document manager in accordance with P1020-1, Laboratory Records Management and with ADESH-AP-006, Records Management Plan.

• EPC-CP-Form-1021, MSGP Quarterly Visual Assessment

#### 8.0 DEFINITIONS AND ACRONYMS

See LANL Definition of Terms.

#### 8.1 Definitions

**Adverse weather conditions** – Weather that prohibits collection of samples such as local flooding, high winds, hurricanes, tornadoes, electrical storms, etc. Could also include drought, extended frozen conditions, etc.

**Best Management Practices (BMPs)** – Schedules of activities, practices, prohibitions of practices, structures, vegetation, maintenance procedures, and other management practices to prevent or reduce pollution. BMPs also include treatment requirements, operating procedures, and practices to control facility site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

**Clarity** – Clearness or cleanness of appearance. This includes the visual observation of suspended sediment.

**Color** – Unpolluted water will be clear and colorless. Color must not be confused with clarity.

**Floating solids** – Particulate material floating on the surface of the water. Examples include raw or waste materials and common trash.

**Foam** – An accumulation of fine frothy bubbles formed in or on the surface of water. A mass of bubbles of air in a matrix of liquid film.

**Measurable storm event** – Precipitation that results in an actual discharge from your site that follows the preceding measurable storm event by at least 72 hours (3 days).

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**Odor** – The property or quality of waters that affects or stimulates the sense of smell. Examples of odors that may be present are burnt oil, petroleum hydrocarbon, sewage, diesel, sulfuric, or detergent odors.

**Oil sheen** – The presence of rainbow-like colors glistening on the surface of a liquid. The color of oil sheen will vary dependent on thickness and consistency.

**Settled solids** – Settled particulate material i.e., heavier than water. Examples include sand, gravel, metal turnings, and glass.

**Suspended solids** – Particulate materials that are floating between the bottom of the sample and the surface of the water.

**Unstaffed and Inactive Sites** – A facility maintaining certification with the SWPPP that it is inactive and unstaffed and visual examinations are not required.

#### 8.2 Acronyms

See LANL Acronym Master List.

ВМР	Best Management Practice
DEP	Deployed Environmental Professional
EPC-CP	Environmental Protection and Compliance – Compliance Programs
FOD	Facility Operations Division
IWD	Integrated Work Document
LANL	Los Alamos National Laboratory
MC Express	Maintenance Connection MC Express web application
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SWPPP	Storm Water Pollution Prevention Plan

#### 9.0 REFERENCES

Federal Register: Final National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Industrial Activities. Federal Register: September 29, 2008, Volume 73, Number 189

P1020-1, Laboratory Records Management

ADESH-AP-006, Records Management Plan

EPC-CP-QP-022, MSGP Corrective Actions

#### 10.0 ATTACHMENTS

**Attachment 1:** Screenshot Examples of EPC-CP-Form-1021 in MC Express

**Attachment 2:** EPC-CP-Form-1021 Hard Copy Example

**Attachment 3:** Screenshot Examples of Printing from Maintenance Connection

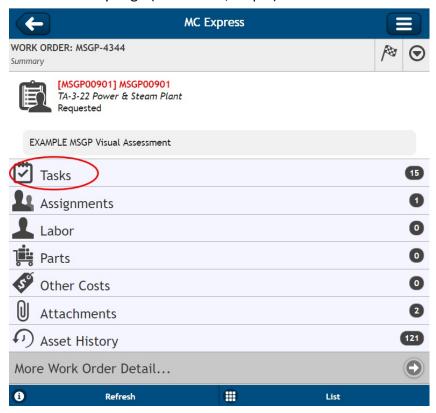
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### Attachment 1 – Screenshot Examples of EPC-CP-Form-1021 in MC Express

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Work Order Summary Page (section 4.0, step 2)



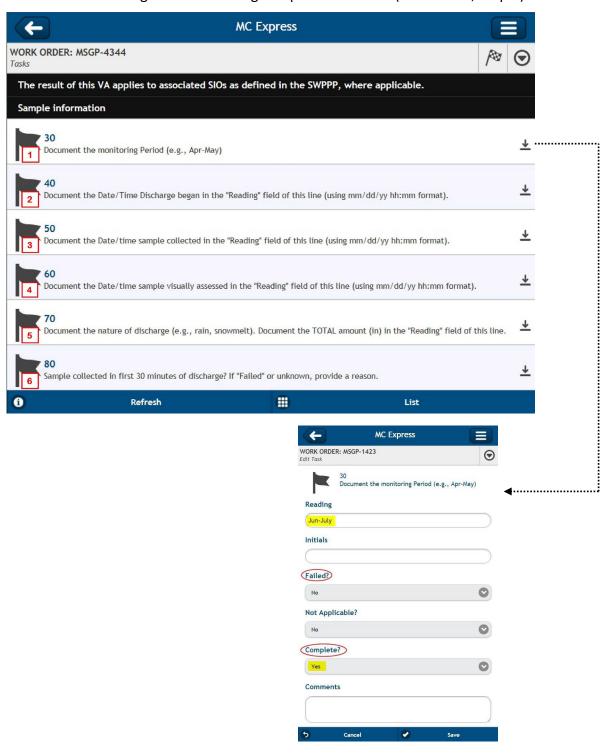
<b>MSGP</b>	Stormwater	Visual
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#### Attachment 1 - Screenshot Examples of EPC-CP-Form-1021 in MC Express

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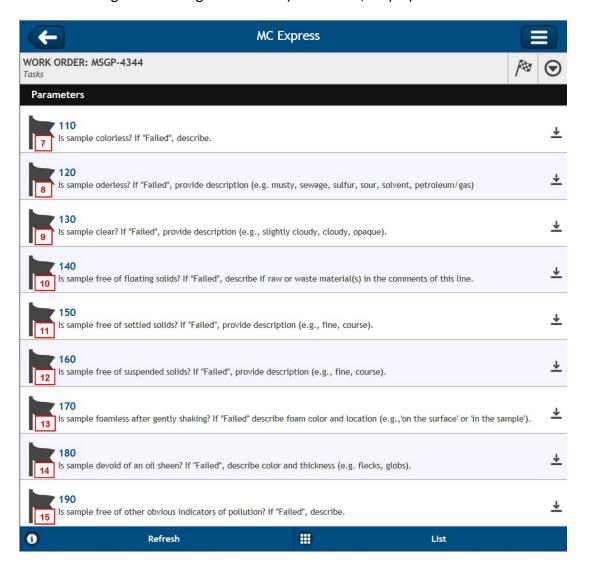
Work Order Tasks Page – Documenting Sample Information (Section 4.0, Step 3)



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# Attachment 1 – Screenshot Examples of EPC-CP-Form-1021 in MC Express (cont.) Page 3 of 4

Work Order Tasks Page – Assessing Parameters (section 4.2, step 7)



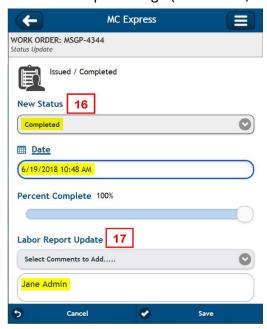
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## Attachment 1 - Screenshot Examples of EPC-CP-Form-1021 in MC Express (cont.)

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Work Order Status Update Page (section 4.3, steps 3 and 4)



Work Order Status Update Page (section 4.3, step 6)



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#### Attachment 2 - EPC-CP-Form-1021 Hard Copy Example

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Work Order MSGP-4344 Los Alamos National Lab - ADESH MSGP Monitoring Stations Printed 6/19/2018 - 10:55 AM (Duplicate Copy) Maintenance Details Requested By: Admin, Jane on 6/7/2018 Target: 12/31/2018 MSGP Program 10:51:00 AM Priority/Type: / Inspection 品 RG121.9 MSGP Quarterly Visual Procedure: Department: Utilities and Infrastructure ♣ TA-3-22 Power & Steam Plant Assessment (EPC-CP-A Monitored Outfall (009) Form-1021.2) MSGP00901 Last PM: 5/5/2010 Contact: Admin, Jane Reason: EXAMPLE MSGP Visual Assessment Phone: 123-4567 Special Instructions: NMR053195 Tasks # Description Meas. No N/A Yes The result of this VA applies to associated SIOs as defined in the SWPPP, where applicable. 30 Document the monitoring Period (e.g., Apr-May) Document the Date/Time Discharge began in the "Reading" field of this line (using mm/dd/yy hh:mm format). Document the Date/time sample collected in the "Reading" field of this line (using mm/dd/yy hh:mm format). Document the Date/time sample visually assessed in the "Reading" field of this line (using mm/dd/yy hh:mm format) Document the nature of discharge (e.g., rain, snowmelt). Document the TOTAL amount (in) in the "Reading" field of this line. Sample collected in first 30 minutes of discharge? If "Failed" or unknown, provide a Parameters 110 Is sample colorless? If "Failed", describe. Is sample oderless? If "Failed", provide description (e.g. musty, sewage, sulfur, sour, 120 solvent, petroleum/gas) 9 130 Is sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque). Is sample free of floating solids? If "Failed", describe if raw or waste material(s) in the 140 comments of this line. Is sample free of settled solids? If "Failed", provide description (e.g., fine, course) 160 Is sample free of suspended solids? If "Failed", provide description (e.g., fine, course) Is sample foamless after gently shaking? If "Failed" describe foam color and location 170 (e.g., 'on the surface' or 'in the sample'). Is sample devoid of an oil sheen? If "Failed", describe color and thickness (e.g. flecks, 180 190 Is sample free of other obvious indicators of pollution? If "Failed", describe. Labor Report 16 Completed: 6/19/2018 10:48:00 AM 17 Report: Jane Admin

6/19/2018

I confirm the information as recorded is true, accurate and complete.

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Signature / Name

# MSGP Stormwater Visual Assessments

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#### Attachment 2 - EPC-CP-Form-1021 Hard Copy Example (cont.)

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#### CERTIFICATION STATEMENT

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

(Signatory must meet definition in Section B.11.A, eg. FOD, Ops Mgr, DESH Group Leader, EPC Group Leader)

19 Print name and title:	
Signature:	Date:

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#### Attachment 3 – Screenshot Examples of Printing from Maintenance Connection

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Maintenance Connection Modules Page (Section 4.4)



ATTACHMENT 19: EPC-CP-QP-047, INSPECTING STORMWATER RUNOFF SAMPLERS AND RETRIEVING SAMPLES FOR THE MSGP

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Effective Date: 09/06/2017	Next Review Date: 09/06/2020	Los Alamos NATIONAL LABORATORY EST. 1943

## **Environment, Safety, and Health Directorate**

# **Environmental Protection and Compliance Division – Compliance Programs**

# **Quality Procedure**

# Inspecting Stormwater Runoff Samplers and Retrieving Samples for the MSGP

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<b>Samplers &amp; Retrieving Samples</b>
for the MSGP

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## **REVISION HISTORY**

Document Number and Revision [Include revision number, beginning with Revision 0]	Effective Date [Document Control Coordinator inserts effective date]	<b>Description of Changes</b> [List specific changes made since the previous revision]
ENV-RCRA-QP-047, Rev. 0	03/11	New Document.
ENV-RCRA-QP-047, Rev. 1	02/13	Annual Review and Revision
EPC-CP-QP-047, Rev. 2	09/06//2017	Review and revision. Updated document to new template and new group name. Clarified steps, modified inspection form EPC-CP-Form-1010, and added crosswalk to electronic form in MC Express. This document replaces ENV-RCRA-QP-047 R1.

# Inspecting Storm Water Runoff Samplers & Retrieving Samples for the MSGP

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#### 1.0 INTRODUCTION

Los Alamos National Security, LLC (LANS) through Environmental Protection and Compliance-Compliance Programs (EPC-CP) conducts stormwater monitoring activities required pursuant to the National Pollutant Discharge Elimination System (NPDES), Multi-Sector General Permit (MSGP) at Los Alamos National Laboratory (LANL). The MSGP requires LANL to monitor stormwater runoff from industrial sites relative to potential pollutants.

#### 1.1 Purpose

This procedure describes the process for inspecting ISCO stormwater samplers and retrieving stormwater runoff samples from monitored outfall locations where LANS conducts stormwater monitoring activities pursuant to the NPDES, MSGP at LANL.

Inspections and sample retrieval conducted under this procedure should be documented using the Maintenance Connection Express™ (MC Express) web application on a tablet or notebook style computer. (In the event of electronic hardware or web application failure, personnel may use a printed hard copy to conduct inspection and sample retrieval.)

#### 1.2 Scope

This procedure applies to the EPC-CP technical staff and subcontractor personnel (as applicable) conducting activities at automated stormwater sampling stations used for monitoring industrial stormwater discharge under the MSGP.

The MSGP Program Lead is the primary person with responsibility for the steps in this procedure. EPC-CP personnel will be appointed with responsibility for a subset of sampling stations.

#### 1.3 Applicability

Stormwater runoff samples are collected at MSGP Program stations either with a refrigerated Avalanche® or ISCO 3700 automated sampler, single stage sampler or grab sample. ISCOs are designed to automatically collect water when the water surface is high enough to trigger a liquid level actuator and fill the sample bottles. Field personnel are required to inspect the sampling station while retrieving water samples during MSGP stormwater monitoring periods and at other intervals determined by the program or as directed by program personnel.

#### 2.0 PRECAUTIONS AND LIMITATIONS

Hazards in the work described in this procedure are controlled thorough site specific Integrated Work Documents (IWDs). The hazard level of the activities in this procedure is **moderate**.

Personnel performing steps in this procedure that involve electrical equipment **MUST** be trained to LANL electrical safety standards as prescribed in the IWD before performing those steps.

Inspections may be discontinued during periods or conditions that make sites dangerous for worker safety or prevent personnel from safely accessing sites (e.g., weather-related events such as flash

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floods, flooding, lightning, wildfires, hail, icy roads, deep snow, or LANL operations such as firing shots or burns).

Some terminology varies between the MC Express software and the Maintenance Connection desktop software.

- The "Reading" field in MC Express is the same field as "Reading Final" in Maintenance Connection desktop and "Meas." on a hard copy (printed) work order.
- The "Complete" option in MC Express is the same as a "Yes" answer; the "Failed" option in MC Express is the same as a "No" answer. Maintenance Connection desktop and hard copy (printed) work orders use "Yes" and "No" terminology.

#### 3.0 PREREQUISITE ACTIONS

#### 3.1 Planning and Coordination

- 1. Schedule work to be completed by the target date appearing on the work order(s) or as requested by the MSGP Program Lead if a form is not issued.
- 2. Inform (e.g., by e-mail) Facility contacts, as specified in the IWD, of the schedule for sampler inspection work and locations up to a week (preferred) before but no later than the day before (for minor changes) to be added to the appropriate plan of the day.

**Note:** For some Facility Operations Divisions (FODs) like the Utilities and Institutional Facilities FOD, MSGP stormwater monitoring activities are on a standing plan of the day. However, this must be requested each year at the beginning of the monitoring season.

- 3. The IWD Part II (2101 Form) addresses specific requirements and training for FODs.
- 4. Obtain any necessary additional paperwork before conducting this work, including IWD's, and excavation permits (as necessary).
- 5. Gather the required equipment (see section below) for the work to be done.
- 6. Using the Safari web browser on a tablet or notebook style computer, navigate to http://express.maintenanceconnection.com and select English from the available dropdown menu.
- 7. Log into the MC Express application using your login credentials.
- 8. Confirm that the work order list displayed in the "My Open Work Orders" section matches your sites (see example in Attachment 1). If work orders are not displayed, click the "Refresh" bar at the bottom of the page. The page will refresh and any work orders issued since you logged in will be loaded to the application. If the work order lists still do not match, contact the MSGP Data Management Team for clarification.
- 9. Ensure that field personnel have access to accurate time measurement at the Site. When at the site, the clock time on the ISCO sampler must be set to Mountain Standard Time at all times, with no daylight saving time adjustment.

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#### 3.2 Tools and Equipment

Ensure the following equipment is available in the field vehicle:

- Safety glasses with side shields
- Sturdy hiking boots or steel toed shoes with soles that grip
- Nitrile gloves
- Cell phone (only government cell phones with batteries removed are allowed in secure areas)
- Copy of this procedure
- Copy of the Integrated Work Documents (IWDs)
- Copy of the MSGP Sampling and Analysis Plan
- Site Map(s) (as needed)
- Current electronic or paper inspection form EPC-CP-Form-1010, MSGP ISCO Sampler Inspection and Sample Retrieval
- Sample Collection Log/Field Chain of Custody (see EPC-CP-QP-048)
- Government issued iPad equipment with Safari web browser and Good™ app.
- Necessary access and station keys
- Charged spare battery(s)
- Battery voltage tester
- Clean spare tubing (pump, suction, discharge types, sampler specific)
- Certified clean replacement sample bottles (glass and poly)
- Spare/replacement sampler parts (liquid level actuator, distributor arm)
- Shovel
- Wooden stakes
- Plastic wire "zip" ties
- Coolers with ice or Blue Ice®
- Paper Towels
- Marker pen (permanent, waterproof)
- Ball point pen
- Zip lock bags
- Chain of custody seals

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0.45 micron filter (where applicable)

#### 4.0 INSPECTING STORMWATER SAMPLERS AND RETRIEVING SAMPLES

Throughout this procedure the field inspector should document comments and notations in the "Reading" field of the associated task line. Any additional comments not documented in a "Reading" field can be entered in in the "Comments" field of the same task line. If the inspector needs more space additional comments can be entered in the "Labor Report Update" field (see Section 4.3) when the work order is updated to "Complete" status.

#### 4.1 Inspecting the Sampler

- 1. If conditions prevent a sampler inspection, document the conditions in the "Labor Report Update" field on the work order and notify the Program Lead or designee within 24 hours. Multiple attempts can be documented on the original inspection work order. If the target date cannot be met, the inspector must contact the MSGP Program Lead no less than 24 hours before target date for guidance.
- In MC Express open the work order issued for the current location by clicking on the
  appropriate line. If needed, use the expand arrow located on the right side of the display to
  expand the work order detail information. The work order will open in the display to the
  work order Summary page.
- 3. Click on the "Tasks" bar to navigate to the work order Tasks page.
- 4. Remove the top cover from the sampler.

#### 4.1.1 On Arrival

5. Item 1: Verify and document the sampler is ON and its condition upon arrival by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes" (see example in Attachment 1). Explain any non-functional status (remember to use the "Reading" field unless more space is needed for comments). A hard copy inspection example is provided in Attachment 2 as a crosswalk to the electronic format.

If a sampler has been inactivated (e.g., sample collection completed) prior to this inspection but continues to appear on the inspection form, change the "N/A" line to "Yes". Subsequent questions regarding this sampler may be left unanswered in this section.

#### **CAUTION**

Click the "Save" bar after all entries for a task line have been completed and before proceeding to the next question. Failure to "Save" results in lost data entries.

6. Item 2: Verify and document the ISCO programming displays the following by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes".

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ISCO 3700 sampler display should indicate "Sampler Inhibited"

OR

Avalanche sampler display should indicate "Program Disabled"

If the display does not indicate these messages, describe the messages (e.g., "Done X samples", "sampler off", etc.). If there is no indication of flow and the sampler triggered due to a non-flow event (e.g., animal, tumbleweed, etc.), describe this. Document any messages from the ISCO display.

- 7. Item 3: Verify and document the sampler is set to the correct Mountain Standard Time +/no more than 1 minute by clicking the expand arrow located on the right side of the task line
  and changing the "Complete" or "Failed" line to "Yes". If the sampler is set incorrectly,
  reprogram for the correct Mountain Standard Time. Describe the work performed and
  correction applied (e.g., "ISCO clock was X minutes slow").
- 8. If the location has more than one sampler complete Steps 5 through 7 for each sampler.
- 9. Don nitrile gloves and safety glasses.
- 10. Remove the center section from the sampler.

#### 4.1.2 Water Collection Information

- 11. Item 4: Document any evidence of storm water flow at the sampling location by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Describe the evidence of flow (e.g. sediment or vegetation movement, erosion, standing water).
  - If the sampler did not trip but there is evidence of flow, document the date and time storm water discharge began from the precipitation report.
  - If the sampler tripped or collected storm water, document the date/time stamp from the sampler if available or from the precipitation report.
- 12. Item 5: Document if any storm water was collected (from either a sampler or by grab sample) by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". If any water was collected, complete the Bottle Information section (Item 20). Document if the water is taken by grab sample. Follow the steps in Section 4.2 of this procedure to retrieve samples.
- 13. Item 6: For Avalanche samplers only, verify and document the current refrigerator temperature of the sampler if water was collected by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Record the temperature. If unable to review temperature, check "No" and describe the condition (e.g. dead battery, electrical short).

If no water was collected the field inspector may change the "N/A" line to "Yes".

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14. Item 7: For Avalanche samplers equipped with an ISCO pH and Temp Module, verify and document a pH measurement was taken on the collected water by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Record the pH measurement taken at the time of Bottle 1 as "Average: Minimum:Maximum." If unable to review pH, check "No" and describe the condition (e.g. damaged meter).

If no water was collected the field inspector may change the "N/A" line to "Yes".

#### 4.1.3 Water Retrieval Information

- 15. Item 8: Verify and document whether a sample volume was retrieved (from either a sampler or by grab sample) and taken off site by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". If sample volume was retrieved, record the total volume taken off site.
- 16. Item 9: Verify and document whether a visual assessment of the water was performed by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". The MSGP program visual assessment form is not included in this procedure (see EPC-CP-QP-064). Ensure this form is submitted with the sampler inspection form. If the sample was filtered, conduct the visual assessment and document "Filtered sample."

#### 4.1.4 On Departure

- 17. Item 10: Verify all cable and electrical connections are attached and firmly tightened (not loose) upon departure from the site by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes".
  - Connections may work loose over time due to temperature changes and if there are dissimilar metals at the connection points. The loose connections can introduce voltage spikes which inherently cause current spikes that may result in blown fuses.
  - If the cables require replacement, connections require tightening, or other maintenance performed, describe the work performed (e.g., "tightened connectors on battery).
  - If maintenance cannot be completed at the time of inspection, then describe the condition (e.g. cables chewed through by animal) and follow-up work needed (e.g., replace cables).
- 18. Item 11: Verify and document power supply function. Use a voltage meter to check the voltage of the battery(s) and record the voltage(s). Change the "Complete" or "Failed" line to "Yes" to indicate if battery voltage is acceptable upon departure from the station (≥11.7 for non-floating charged batteries at ISCO 3700 samplers and ≥11.0 for floating-charged batteries at Avalanche samplers).
  - Check the voltage of the solar panel if access can be gained to the weather protected terminal covers on the back of the panel.

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#### 4.1.5 Equipment Specific Tasks

19. Item 12: Verify and document the sampler passes the diagnostic test by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Directions for running the diagnostics test is provided in ENV-CP-QP-045.

If a sampler has been inactivated (e.g., sample collection completed) prior to this inspection but continues to appear on the inspection form, change the "N/A" line to "Yes" on this task line. Subsequent questions regarding this sampler may be left unanswered in this section.

#### Warning

The internal pump tubing must be replaced if the pump tubing life has reached or exceeded the preset pump counts. The internal pump tubing life is set 500,000 pump counts for the 3700 and 1,000,000 for the Avalanche.

Only reset the pump counts after replacing the internal tubing.

If maintenance is necessary and can be performed at the time of inspection, describe the work performed. If maintenance cannot be completed at the time of inspection, then describe the condition and follow up with a description of work needed.

If a sampler has been inactivated (e.g., sample collection completed) prior to this inspection but continues to appear on the inspection form, change the "N/A" line to "Yes" on this task line. Subsequent questions regarding this sampler may be left unanswered in this section.

20. Item 13: Verify and document the sample tubing is free or clear of debris by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes".

Check the physical condition of the sampler including the actuator and intake line for correct location and height in the channel. The actuator, intake line and strainer (if used) should be placed on the cutting side of the channel to help minimize the possibility of sediment burying the intake line/strainer. Adjust as necessary to capture flow within the channel. The actuator, intake line and strainer must be clear of debris (sediment, pine needles, etc.).

If maintenance (e.g., clearing the tube, reposition tubing intake) is necessary and can be performed at the time of inspection, perform the work and describe. If maintenance cannot be completed at the time of inspection (e.g., can't clear intake tubing and spare intake tubing not on hand to replace) then describe the condition and follow up with description of work needed.

21. Item 14: Verify and document the sample tubing has passed a suction test by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". Check the condition of sample tubing and vent tubing.

If maintenance (e.g., replace internal pump tubing) is necessary and can be performed at the time of inspection, perform the work and describe. If maintenance (e.g., replace sampler

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pump) cannot be completed at the time of inspection then describe the condition and follow up with description of work needed.

- 22. Item 15: Verify and document the sampler is ON prior to departing the site by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes".
- 23. Item 16: Verify and document the liquid level actuator has been set to "Latch" prior to departing the site by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". If the sampler tripped and requires reset of the sampling program, reset the actuator by toggling the switch to "Reset" and then back to "Latch".
- 24. Item 17: Verify and document the ISCO programming displays the following by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes".

ISCO 3700 sampler display should indicate "Sampler Inhibited"

OR

Avalanche sampler display should indicate "Program Disabled"

If an error occurs, reconfigure the sampler per EPC-CP-QP-045.

25. If the location has more than one sampler complete Steps 19 through 24 for each sampler.

#### 4.1.6 Maintenance Information

26. Item 18: Verify and document any maintenance completed while on site that is not documented elsewhere on work order by changing the "Complete" or "Failed" line to "Yes". Describe the work performed.

Maintenance items may include (but are not limited to) site clearing, installing new or additional equipment, removing equipment, animal/pest mitigation, problems with equipment location, etc.

If a battery was replaced record the voltage of the new battery and the battery identification number. If the battery does not have an identification number, contact the MSGP Program Manager to have one assigned. Once assigned, the number must be painted or written in a permanent manner on the battery.

27. Item 19: Verify and document any maintenance needed that could not be completed while on site that is not documented elsewhere on work order by changing the "Complete" or "Failed" line to "Yes". Describe any work needed. Refer to EPC-CP-QP-045 for sampler operation and maintenance.

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#### 4.1.7 Bottle Information

- 28. Item 20: Document water collected by clicking the expand arrow located on the right side of each bottle's task line and change the "Complete" or "Failed" line to 'Yes'. Record the following information for each bottle by position number in the carousel.
  - Date (MM/DD/YY or MM-DD-YY) and time the ISCO collected water.
  - Volume of water in the bottle
  - Type of bottle (e.g. G for glass, P for poly)
  - Specific ISCO displayed message, if present

If the sampler(s) did not trigger, change the "N/A" line to 'Yes' for Bottle #1 of each sampler and leave the other Bottle task lines unanswered.

If a sampler has been inactivated (e.g., sample collection completed) prior to this inspection but continues to appear on the inspection form, change the "N/A" line to "Yes" on this task line. Subsequent questions regarding this sampler may be left unanswered in this section.

- 29. If the location has more than one sampler complete Step 28 for each sampler.
- 30. Replace and secure the sampler top cover and secure the sampler shelter (if sampler is in a shelter).

#### 4.2 Retrieving Samples

- 1. Don nitrile gloves and safety glasses.
- 2. Add up the volume of water collected (see flow chart in Attachment 3) and check that the total volume of water in glass and poly matches the required volume for the specific location identified in the MSGP Sampling and Analysis Plan. The volume of water required to complete analytical may vary by monitored location.
  - If sample volume is sufficient to fulfill all analytical requirements, continue with Step 3.
  - If sample volume is sufficient to fulfill part of the analytical requirements, consult the
    prioritization order on the MSGP Sampling and Analysis Plan to determine which
    analytical to fulfill OR contact the MSGP Data Manager, continue with Step 3 but retrieve
    only the volume needed.
  - If the collected sample will NOT fulfill the minimum required volume for any analytical:
    - Record total volume retrieved as "0" in Item 8
    - Complete a Visual Assessment (see EPC-CP-QP-064)
    - Pour out all water on the ground
    - Skip to Step 10 below

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#### **CAUTION**

ISCO Avalanche samplers are programmed to cool samples to 4°C. If water is collected and the refrigerator temperature reads higher than 6°C, **do not** retrieve samples that require ICE preservation. Refer to the MSGP Sampling and Analysis Plan for preservation requirements.

- 3. Remove filled and partially-filled bottles from the carousel.
- 4. For samples retrieved, immediately place lids onto the sample bottles and securely seal. Place custody seal tape on each bottle.
- 5. Write the date and time collected, Sampler Location number, and the corresponding carousel number on each retrieved sample bottle. Retrieve the sample collection date and time from the ISCO sampler.
- 6. Record total volume retrieved in Item 8.
- 7. Conduct a Visual Assessment (see EPC-CP-QP-064).
- 8. Place retrieved sample bottles in a cooler with blue ice (or equivalent).
- 9. Return any excess water or collected volume that exceeded the amount required to the ground at the location collected.
- 10. Install new certified clean sample bottles in the carousel to replace those bottles that collected stormwater. The number and type of bottles may vary. Ensure bottles match the configuration specified in the MSGP Sampling and Analysis Plan.
- 11. The 0.45 micron filter may also need to be replaced. Consult the most current revision of the Sampling and Analysis Plan for specifics. If the sampler is turned off for the quarter but new certified clean sample bottles and/or the filter have not been replaced, note this as follow-up maintenance required (see Item 19).
- 12. Replace and secure the center section of the sampler.
- 13. Return to steps in Section 4.1.

#### 4.3 Completing the Inspection Form

- 1. When all task lines have been completed, make sure you have clicked the "Save" bar at the bottom of the page.
- 2. Click the "Back" arrow button in the upper left hand corner to exit the work order Tasks page and return to the Work Order Summary page.
- 3. Click the checkered flag in the upper right corner of the work order Summary page.

#### **CAUTION**

MC Express automatically changes the work order status to "Closed" and auto-populates the date and time fields.

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- 4. Item 21: Click on the expand arrow located on the right side of the "New Status" field and select "Completed" from the available dropdown menu. Ensure the date and time autopopulated are the date and time the inspection was completed.
  - If these fields need to be updated, click the "Date" field to modify it. Make necessary adjustments using the available timestamp application and click "Set" to apply changes.
- 6. Item 22: The inspector must type in his/her name in the "Labor Report Update" field.
  - Any additional notes, observations, or site conditions not documented in a task line "Reading" or "Comments" field can also be documented in the "Labor Report Update" field.
- 7. Scroll down the page to the "Signature" bar and click the expand arrow on the left side of the bar to open the "Signature" field.
- 8. Item 23: Capture an electronic signature by drawing with a finger on the tablet screen. The Lead Inspector is certifying that the information submitted is "true, accurate, and complete" by electronically signing the work order.
  - **Note:** If using MC Express on a desktop screen (not a tablet), the mouse must be used to sign electronically.
- 9. Click on the "Save" bar at the bottom of the page to close the "Signature" field.
- 10. Click on the "Back" button located in the upper left hand corner to return to the "My Open Work Orders" page.
- 11. Once you have completed an inspection, click on the Menu button again, and then click the "Logout" bar. Close the browser. All work will automatically uploaded from the MC Express application to the MC database.

Always log out of MC Express when you have finished work OR if work is interupted.

#### 4.4 REMOVING STORMWATER SAMPLES FROM THE FIELD

- 1. If samples were collected, deliver the samples and corresponding Sample Collection Log/Field Chain of Custody form to the EPC-CP Stormwater Program Laboratory at TA-59-1.
- 2. Sign the Sample Collection Log/Field Chain of Custody and place it with the sample(s) in the refrigerator. Ensure custody seal tape is intact on each sample bottle. Lock the refrigerator to prevent tampering. Refer to EPC-CP-QP-048, *Processing MSGP Stormwater Samples* for instruction on processing samples and submitting samples for shipping to an analytical laboratory.

#### 5.0 TRAINING

The following personnel require training before implementing this procedure:

• EPC-CP technical staff and subcontract or other personnel who inspect automated stormwater samplers and retrieve stormwater samples for the MSGP.

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For EPC-CP staff the training method for this procedure is "self-study" (reading). Other participating groups may require training documentation pursuant to local procedures.

Personnel performing this procedure will be familiar with the most current versions of the following procedures and operation manuals:

- EPC-CP MSGP Sampling and Analysis Plan for the current monitoring year
- Manual for Teledyne ISCO Sampler Model 3700
- Manual for Teledyne ISCO Avalanche® sampler
- Manual for Teledyne ISCO 701 pH/Temperature module (if equipped at station)

Personnel performing steps in this procedure that involve electrical equipment **MUST** be trained to LANL electrical safety standards as prescribed in the IWD before performing those steps.

#### 6.0 RECORDS

Records generated by this document will be submitted to the EPC-CP Records Management designated point of contact or document manager in accordance with P1020-1, *Laboratory Records Management* and with ADESH-AP-006, *Records Management Plan*.

• Completed ISCO Sampler Inspection and Sample Retrieval form(s)

#### 7.0 DEFINITIONS AND ACRONYMS

#### 7.1 Definitions

See LANL Definition of Terms.

#### 7.2 Acronyms

See LANL Acronym Master List.

EPC-CP	Environmental Protection and Compliance-Compliance Programs
IWD	Integrated Work Document
LANL	Los Alamos National Laboratory
LANS	Los Alamos National Security, LLC
MC Express	Maintenance Connection MC Express web application
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System

#### 8.0 REFERENCES

None.

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#### 9.0 ATTACHMENTS

**Attachment 1**: Screenshot Examples of EPC-CP-Form-1010.02 in MC Express

Attachment 2: Crosswalk of EPC-CP-Form-1010.02 Hard Copy Format to Electronic Format Example

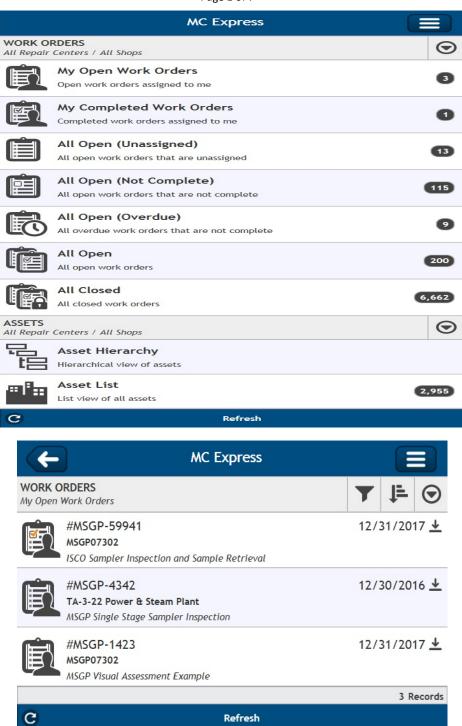
**Attachment 3**: Flow Chart for Sample Retrieval

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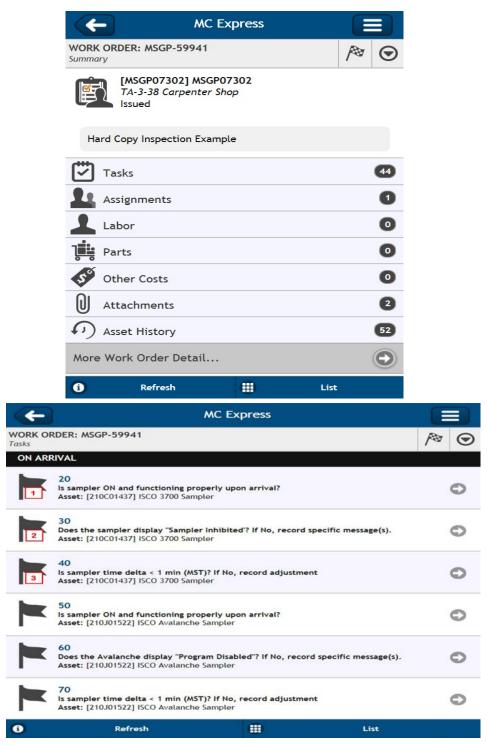


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#### Attachment 1: Screenshot Examples of EPC-CP-Form-1010.02 in MC Express (cont.)

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#### Attachment 1: Screenshot Examples of EPC-CP-Form-1010.02 in MC Express (cont.)

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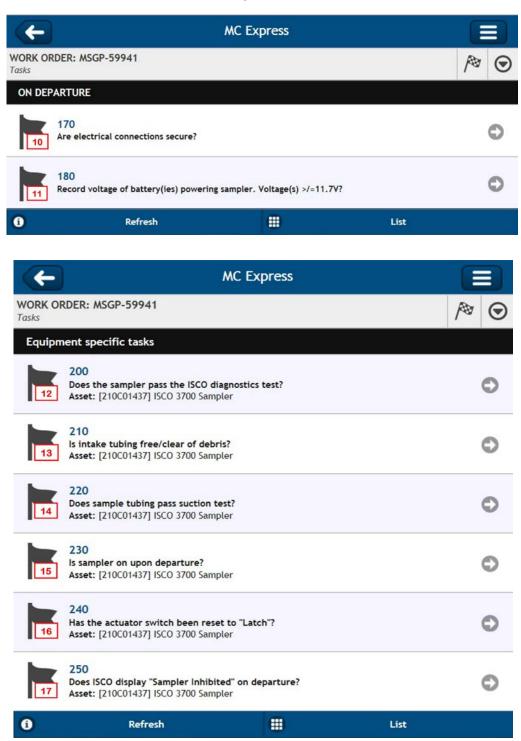


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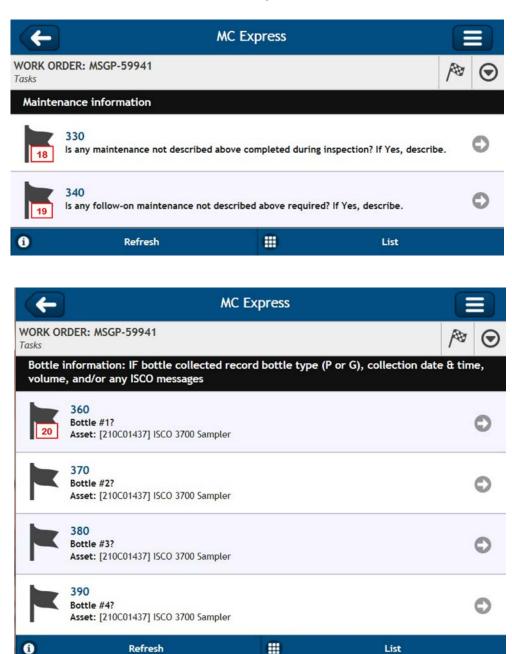


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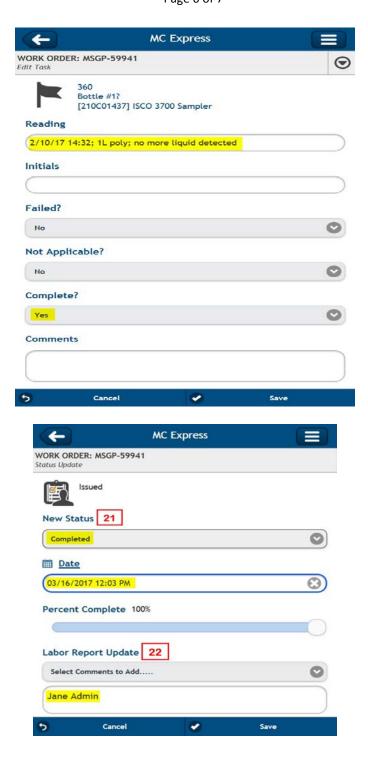


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Attachment 1: Screenshot Examples of EPC-CP-Form-1010.02 in MC Express (cont.)

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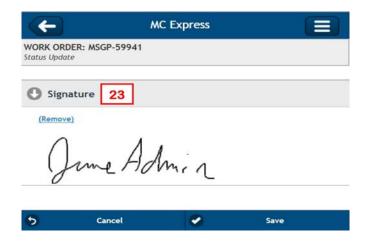


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### Attachment 2: Crosswalk of EPC-CP-Form-1010.02 Hard Copy Format to Electronic Format Page 1 of 2

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#### Work Order MSGP-59941

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	Procedu	ire:	MSGP ISCO Sampler Inspection and Sample Retrieval (EPC-CP-	Department:	Utilities and Infrastructure		38 Carpent ored Outfal P07302		•	
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┸	ON ARE	RIVAL								
1	20	ISCO 3	3700 Sampler [210C0143]	7] Is sampler ON	and functioning properly up	on arrival?				
2				7] Does the sam	oler display "Sampler Inhibit	ed'? If No,		_	_	_
4	30		specific message(s).	99 ( C E'	- I-II I - I - (MOT) 0 II N -					
3	40	adjustr		[] Is sampler time	e delta < 1 min (MST)? If No	, record				
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	60		ed"? If No, record specific		artima dalta < 1 min (MCT)	) If NIo		14	100	
	70		adjustment	101522] IS Sampl	er time delta < 1 min (MST)	II NO,				
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5	100	Is any	water collected? If YES, co	omplete Bottle In	formation section.					
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8	140		ample volume RETRIEVED							-1
9	150		Visual Assessment perfori EPC-CP-TP-064).	ned? If Yes, com	plete the MSGP Visual Ass	essment		П.		
Ť			,					Last		
40	ON DEF									
10	170		ectrical connections secure							
11	180	Record	I voltage of battery(ies) por	wering sampler.	Voltage(s) >/=11.7V?					
$\perp$	Equipm	ent spe	ecific tasks							
12	200	ISCO 3	3700 Sampler [210C0143]	7] Does the sam	oler pass the ISCO diagnost	ics test?				
13	210	ISCO 3	3700 Sampler [210C0143]	7] Is intake tubing	g free/clear of debris?					
14	220	ISCO 3	3700 Sampler [210C0143]	7] Does sample t	ubing pass suction test?					
15	230	ISCO 3	3700 Sampler [210C0143]	7] Is sampler on	upon departure?					
16	240	ISCO 3	3700 Sampler [210C0143]	7] Has the actuat	or switch been reset to "Late	ch"?				
I				7] Does ISCO dis	splay "Sampler Inhibited" on					
17	250	depart	ure?							

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# Attachment 2: Crosswalk of EPC-CP-Form-1010.02 Hard Copy Format to Electronic Format (cont.)

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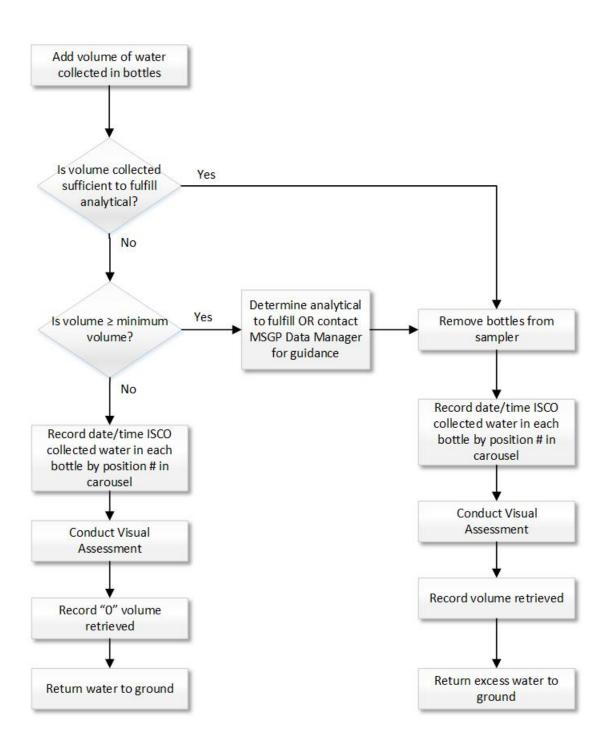
	260	ISCO Avalanche Sampler [210J01522] Does the sampler pass the ISCO diagnostics test?			
	270	ISCO Avalanche Sampler [210J01522] Is intake tubing free/clear of debris?			
	280	ISCO Avalanche Sampler [210J01522] Does sample tubing pass suction test?			
	290	ISCO Avalanche Sampler [210J01522] Is sampler on upon departure?			
	300	ISCO Avalanche Sampler [210001022] Is sampler on upon departure?  ISCO Avalanche Sampler [210J01522] Has the actuator switch been reset to "Latch"?	-		-
	300			-11	
	310	ISCO Avalanche Sampler [210J01522] Does Avalanche display "Program Disabled" on departure?			
	Mainten	ance information			
18	330	Is any maintenance not described above completed during inspection? If Yes, describe.		ET.	П
19	340	Is any follow-on maintenance not described above required? If Yes, describe.			
Ι		nformation: IF bottle collected record bottle type (P or G), collection date & time, volume, and/o	or any Is	sco	
20	360	ISCO 3700 Sampler [210C01437] Bottle #1?		100	
Т	370	ISCO 3700 Sampler [210C01437] Bottle #2?			
	380	ISCO 3700 Sampler [210C01437] Bottle #3?			
	390	ISCO 3700 Sampler [210C01437] Bottle #4?			
	400	ISCO 3700 Sampler [210C01437] Bottle #5?			
	410	ISCO 3700 Sampler [210C01437] Bottle #6?			
	420	ISCO 3700 Sampler [210C01437] Bottle #7?			
	430	ISCO 3700 Sampler [210C01437] Bottle #8?			-
	440	ISCO 3700 Sampler [210C01437] Bottle #9?			
			무		
	450 ISCO 3700 Sampler [210C01437] Bottle #10?				
	460 ISCO 3700 Sampler [210C01437] Bottle #11?		-	ᄪ	
	470				
	480	ISCO Avalanche Sampler [210J01522] Bottle #1?			
	490	ISCO Avalanche Sampler [210J01522] Bottle #2?			
	500	ISCO Avalanche Sampler [210J01522] Bottle #3?		-21	
	510	ISCO Avalanche Sampler [210J01522] Bottle #4?			
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<b>Samplers &amp; Retrieving Samples</b>
for the MSGP

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#### **Attachment 3: Flow Chart for Sample Retrieval**

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ATTACHMENT 20: EPC-CP-QP-048, PROCESSING MSGP STORMWATER SAMPLES

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Effective Date: 10/18/2019	Next Review Date: 10/18/2022	NATIONAL LABORATORY ————————————————————————————————————

Environment, Safety, Health, Quality, Safeguards, and Security Directorate

Environment Protection and Compliance – Compliance Programs Group

Quality Procedure

# **Processing MSGP Stormwater Samples**

Hazard Grading:	⊠ Low		Hi	igh/Complex	
Usage Level: Referen		ce UET		Mixed: UET Sections:	
Status:	New	Major Revision		Minor Revision	
	Review	w/No Changes	Other: New EPC-CP format and numbering system		
Safety Basis:	⊠ N/A	USQ	U:	USI Number:	
		Document Author	/Subje	ect Matter Expert:	
Name:		Organization:	Si	gnature:	Date:
Holly L. Wheeler		EPC-CP	Si	gnature on File	10-17-19
Derivative Classifier:					
Name: Org		Organization:	Si	gnature:	Date:
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Samples		

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#### **REVISION HISTORY**

Document Number and Revision [Include revision number, beginning with Revision 0]	Effective Date [Document Control Coordinator inserts effective date]	Description of Changes [List specific changes made since the previous revision]
ENV-RCRA-QP-048, Rev. 0	07/2011	New document
ENV-CP-QP-048, Rev. 1	09/2013	Annual Review and Revision, new format, process change, and new organization name.
EPC-CP-QP-048, Rev. 2	06/05/2017	Review and Revision, new format, and new organization name, clarified steps, updated attachments.
EPC-CP-QP-048 R3	10/05/2017	Updated Sample Collection Log instructions, added a step describing evidence of flow, and added section for addressing excess stormwater material.
EPC-CP-QP-048 R4	01/31/2019	Sample Collection Log form and associated text updated. Added text for collecting quality control samples.
EPC-CP-QP-2106 R0	10/18/2019	Supersedes EPC-CP-QP-048 R4. New EPC-CP procedure format and numbering system. Minor editorial updates.

# Processing MSGP Stormwater Samples

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#### 1.0 INTRODUCTION

Triad LLC, the operator for Los Alamos National Laboratory (LANL or the Laboratory), conducts stormwater monitoring activities pursuant to the National Pollutant Discharge Elimination System (NPDES), Multi-Sector General Permit (MSGP). As part of this monitoring, Environmental Protection and Compliance, Compliance Programs (EPC-CP) personnel collect stormwater discharge samples from outfalls at industrial sites and prepare them for analysis.

#### 1.1 Purpose

This procedure describes the process for filtering, preserving and preparing stormwater samples for shipment to an analytical laboratory from locations where EPC-CP conducts stormwater monitoring activities required pursuant to the NPDES MSGP. This procedure may also be used for other Associate Laboratory Directorate for Environment, Safety, Health, Quality, Safeguards, and Security (ALDESHQSS) stormwater monitoring activities as needed.

#### 1.2 Scope

Stormwater samples are collected in the field with either a refrigerated Avalanche® or ISCO 3700 automated sampler, single stage sampler, or by hand. When in-line filtration is not possible, sample filtration, along with chemical preservation (as required) is conducted immediately following sample retrieval in the field or in the EPC-CP Stormwater Laboratory (TA-59-01).

Sample collection, submission, and analysis is conducted using Environmental Protection Agency (EPA) and New Mexico Water Quality Control Commission guidelines. MSGP monitoring samples are collected and analyzed according to test procedures approved under Title 40 of the Code of Federal Regulations Part 136 unless other test procedures have been specified in the MSGP. Quantitation limits associated with these test procedures are sufficiently sensitive to meet MSGP limits.

#### 1.3 Applicability

This procedure applies to EPC-CP technical staff and subcontractor personnel (as applicable) who conduct processing and chemical preservation of stormwater samples either in the EPC-CP Stormwater Laboratory or in the field.

The MSGP Program Lead is the primary person responsible for this procedure. EPC-CP personnel are appointed responsibility for a subset of sampling stations. Other stormwater monitoring programs or projects utilizing this procedure will refer to program or project specific roles and responsibilities.

#### 2.0 PRECAUTIONS AND LIMITATIONS

The hazard level for the activities in this procedure is <u>LOW</u>. An Integrated Work Document Part II (2101 Form) will address any site-specific requirements and training for Facility Operations Divisions (FOD) if required by the FOD.

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Use only sample containers that are documented to meet or exceed "US EPA Specification and Guidance for Contaminant-Free Sample Container" (Publication 9240.05A, EPA/540/R-93/051, December 1992). Never clean or re-use sample containers. Keep containers in a clean, dry place until a sample is ready for processing and transfer to the appropriate container(s).

#### 3.0 PREREQUISITE ACTIONS

#### 3.1 Planning and Coordination

Refer to the most current revision of the MSGP or program/project specific Sampling and Analysis Plan (SAP) to determine the need for collecting quality control samples. Collect the types and quantities of quality control samples at the locations specified.

Schedule and complete stormwater processing to meet the analytical holding time requirements identified in the MSGP SAP or as requested by the MSGP Program Lead. Other stormwater monitoring programs or projects utilizing this procedure will refer to their program or project specific SAP.

The MSGP Data Manager will generate Water Sample Collection and Processing Log/Field Chain of Custody (SCPL) form(s) at the beginning of the MSGP monitoring season and/or the beginning of each MSGP monitoring quarter. The MSGP Data Manager will generate Chain of Custody/Analysis Request(s) from the Environmental Information Management (EIM) database as stormwater is collected. If the MSGP Data Manager is not available, forms will be obtained from the EPC-CP Sample Management Office (SMO).

#### 3.2 Performance Documents

Personnel performing this procedure will be familiar with the most current versions of the following documents if the equipment or chemicals are utilized.

- Peristaltic Pump User Manual (e.g., GeoTech)
- Material Safety Data Sheet or Safety Data Sheet for preservation chemicals

#### 3.3 Special Tools, Equipment, Parts and Supplies

Ensure the following equipment is available:

- Safety glasses with side shields
- Nitrile gloves
- Lab coat
- Eyewash in Stormwater Lab (or portable eyewash in the field)
- Water SCPL form
- Chain of Custody/Analysis Request
- EPC-CP MSGP SAP most recent revision for the current monitoring year OR project specific monitoring plan

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- Sample containers (glass and poly bottles)
- Sample container lids
- Acid and base preservatives
- Clean silicon (e.g., Tygon) tubing
- Portable peristaltic pump (e.g., Geopump or equivalent)
- 0.45 micron (μm) and/or 0.10 μm cartridge filters (where applicable)
- Deionized water (where applicable)
- Paper towels
- Coolers with ice, Blue Ice®, or equivalent
- Ball point pen
- · Permanent marker
- Chain-of-custody seals/tape
- · Copy of this procedure
- Cell phone (only government cell phones are allowed in secure areas) (See
   <a href="https://int.lanl.gov/policy/documents/P217.pdf">https://int.lanl.gov/policy/documents/P217.pdf</a> for requirements for using portable electronic devices on Laboratory property.

#### 4.0 PROCESSING SAMPLES

In this procedure, sample collection bottles are the bottles in which the sample was collected in the field. Sample containers are containers into which the original sample is transferred (as necessary) during processing and shipped to the analytical laboratory.

**NOTE:** Prior to performing any of the steps in the following sub-sections, ensure that you are wearing the proper clothing. Don nitrile gloves, safety glasses with side shields, and a lab coat. Confirm that the eyewash station is operational prior to processing samples.

#### 4.1 Preparation for Processing Samples

#### Sample Retriever

[1] Arrange sample collection bottles on the workbench in order by MSGP sampling location, ensuring to distinguish bottles collected via in-line filtration from non-filtered bottles, where applicable.

#### **CAUTION**

Process only one sample set (i.e., samples listed on one SCPL form or samples from one location) at a time to ensure stormwater from different locations is not co-mingled.

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- [2] Cross-check the Location ID (e.g., MSGP00201) on the sample bottles with the LOCATION ID on the SCPL form (see example in Attachment 1).
- [3] Ensure the pre-populated information on the SCPL form is correct. Document any changes [e.g., change FIELD MATRIX code from rain (WT) to snowmelt (WM)].
- [4] Write the following information on the SCPL.
  - [a] Sampler Inspection and Sample Retrieval form (refer to EPC-CP-QP-2103) identification number (e.g., Work Order: MSGP-xxxx);
  - [b] Date/time the sample was collected in the field (e.g., date/time automated sampler filled sample bottles or a grab sample was taken);
  - [c] Date/time the sample was retrieved from the field;
  - [d] "Not Applicable" (N/A) in the LOCATION SYNONYM(S) field unless the information is required by the SAP;
  - [e] N/A in the PRIORITY box if box is not pre-populated;
  - [f] Any pertinent information regarding sample collection and/or retrieval in the SAMPLE COMMENTS field (e.g., grab sample collected by hand, recent erosion observed up-gradient of sampler) or N/A;
  - [g] N/A for FIELD PARAMETER Sample Time (this is documented at the top of the form as COLLECTION TIME);
  - [h] pH measurement taken at the time the sample was collected in the field (if applicable) or N/A;
  - [i] Indicate if a visual assessment was performed.
    - <u>IF</u> a visual assessment <u>WAS NOT</u> performed, THEN write N or No in the Visual Inspection space.
    - <u>IF</u> a visual assessment <u>WAS</u> performed, <u>THEN</u> write Y or Yes in the Visual Inspection space and the identification number from the MSGP Visual Assessment form (refer to EPC-CP-QP-2105) (e.g., MSGP-xxxx).
  - [j] The printed name and signature of the person who retrieved the sample in the COLLECTED BY box and date/time the sample was retrieved from field
- [5] <u>IF</u> the person who retrieved the sample is processing, <u>THEN</u> write N/A in the first RELINQUISHED BY and RECEIVED BY boxes.
- [6] <u>IF</u> the person who retrieved the sample is NOT processing, THEN
  - [a] He/she will print and sign his/her name and the date/time samples are relinquished to the processor in the RELINQUISHED BY box.

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[b] The processor will print and sign his/her name and the date/time samples are received in the first RECEIVED BY box.

#### **Sample Processor**

- [7] Ensure the following information is correct for the analysis requested on the SCPL.
  - [a] Sample container volume and type [e.g., 500 milliliter (mL) POLY].
  - [b] Preservation type (e.g., ICE, HNO<sub>3</sub>).
  - [c] Note any deviation from the planned sample container volume, type, or preservation on the SCPL.
- [8] Determine which samples require filtration and chemical preservation as requested on the SCPL.
  - [a] Mark each container lid with the 3-digit outfall ID, required analysis, filtration requirement, and preservative requirement.
    - **NOTE 2:** Requirements are also identified in the most current SAP revision.
- [9] For split samples, follow these steps:
  - [a] Turn the sample collection bottle upside down multiple times to ensure sediment is loose from the bottom of the bottle.
  - [b] Pour sample into sample containers ensuring the sample remains homogenized throughout the transfer.
- [10] Refer to Section 4.2 Filtering Samples, Section 4.3 Preserving Unfiltered and Filtered Samples, and Section 4.4 Quality Control Samples as needed.
- [11] Indicate if each sample on the SCL was collected by writing Y for Yes or N for No in the COLLECTED Y/N box.
- [12] <u>IF</u> the SPECIAL INSTRUCTIONS box is not pre-populated, <u>THEN</u> write N/A in the box.
- [13] Document any other deviations from the planned sample processing on the SCPL (e.g., turbid sample required extra filtration step, used standard deionized water in lieu of ultrapure water for field blank) under PROCESSING COMMENTS or SAMPLING COMMENTS,
  - OR write N/A.
- [14] <u>IF</u> no further processing is required (e.g., chemical preservation), <u>THEN</u> apply a chain-of-custody seal/tape around the bottle and lid and sign and date the seal/tape.
- [15] The person processing the sample will print and sign his/her name and indicate the date/time samples were processed in the PROCESSED BY box.
- [16] Proceed to Section 4.5.

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#### 4.2 Filtering Samples

Filter samples if specified on the SCPL or if an in-line filter was not used during sample collection.

- [1] Select the appropriate sized cartridge filter (e.g., 0.10µm or 0.45µm).
- [2] Set up the filter assembly.
  - [a] Attach an appropriate amount of silicone tubing to both ends of the cartridge filter.
  - [b] Place the filter upstream of the peristaltic pump to prevent overpressurization.
  - IF the sample contains a significant amount of sediment,
     THEN a pre-filter of the same size or larger micron capacity may be used.
- [3] For split filtered samples, follow these steps:
  - [a] Move the intake tube up and down through the sample during filtration.
    - **NOTE 1:** A sample collected solely for filtration can be filtered without being homogenized by gently shaking.
- [4] Replace the filter if any of the following conditions occur:
  - flow diminishes,
  - the pump begins to make a grinding sound, or
  - the tubing is forced off the filter by backpressure.
- [5] Place the lid on the container.
  - [a] Ensure the lid is securely affixed to the container.
  - [b] Add a check mark next to the filtered requirement previously marked on the lid to indicate that filtration has been completed.
  - [c] Clean and dry the exterior of sample container.
  - [d] Check sample container for leakage and breakage.
- [6] Remove and dispose of filter and tubing when filtration of one sample set (location) has been completed.
  - **NOTE 2:** A new filter must be used with each new sample set.
- [7] Return to Section 4.1, Step 11.

#### 4.3 Preserving Unfiltered and Filtered Samples

Preservation entails the addition of acid or base to a sample. Acids currently used include hydrochloric acid (HCl), nitric acid (HNO<sub>3</sub>), and sulfuric acid (H<sub>2</sub>SO<sub>4</sub>). Bases currently used in preservation include sodium hydroxide (NaOH). Review the appropriate Material Safety Data Sheet or Safety Data Sheet for specific guidelines prior to preserving samples. Specific acids/bases used

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depend on the required monitored parameters and are subject to change (e.g., biennial Clean Water Act §303(d)/305(b) Integrated Report updates).

#### WARNING

Preservatives are strong acids and bases that can cause severe burns. Take extreme care when using these acids and bases.

- [1] Review the analysis requested on the SCPL or SAP.
- [2] Select the pre-measured preservative type and size that matches the sample container size.
  - [a] <u>IF</u> you only have one size pre-measured preservative that does not match the sample container size, <u>THEN</u> you will use more than one. For example, if you have a 1-liter sample container and 500 mL pre-measured preservative vial, you will need to add two preservative vials to the sample container.
  - **NOTE:** Never "split" a larger volume pre-measured vial to preserve a smaller volume container (e.g., do not pipette from a 1-liter, pre-measured preservative vial to preserve a 500 mL sample). Error in measurement precision may lead to a risk of violating Department of Transportation shipping requirements.
- [3] Add the preservative (acid or base) to the sample.
  - [a] Securely affix the lid to the container.
  - [b] Agitate the preserved sample by turning the container upside down two to three times.
- [4] Add a check mark next to the preservation type previously marked on the lid to indicate that preservation has been completed.
  - [a] Clean and dry the exterior of sample container.
  - [b] Check sample container for leakage and breakage.
- [5] Return to Section 4.1, Step 11.

#### 4.4 Quality Control Samples

Refer to the SCPL or the program specific SAP for the types and quantities of quality control samples and the locations where these samples will be collected.

#### 4.4.1 Field Blank Samples

- [1] Review the analysis requested on the SCPL or SAP.
  - [a] Ensure the sample container volume, type, and preservation type is correct for the analysis requested (e.g., 500 mL POLY, HNO<sub>3</sub>).

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[b] Note any deviation from the planned sample container volume or type on the SCPL.

#### **CAUTION**

**DO NOT** use tap, distilled, or drinking water purchased from a local store. These sources may not meet the water quality standards specified in the New Mexico Administrative Code (Title 20, Chapter 6, Part 4).

- [2] Obtain analyte free water (e.g., High Performance Liquid Chromatography grade ultrapure in amber glass) in sealed bottle(s) in sufficient quantity to fulfill the analysis requested.
- [3] Select another empty sample container(s) of the same type and volume for the analysis requested.
- [4] Mark the bottle and container lids with the 3-digit outfall ID and "Field Blank".
- [5] Transport both the field blank bottle(s) and container(s) to the sampling location.
- [6] During retrieval of samples, open the field blank bottle(s) and pour the analyte free water into the field blank sample container(s).
- [7] Securely affix the lid(s) to the container(s).
- [8] Replace the lid on the analyte free water bottle.
  - [a] <u>IF</u> 500 mL or greater remain in the bottle, <u>THEN</u> replace lid and mark the bottle with the date it was opened and "For Decon Use Only".
  - [b] <u>IF</u> less than 500 mL remain in the bottle, <u>THEN</u> dispose of water in the EPC-CP Stormwater Laboratory sink and dispose of the bottle.
- [9] Return the field blank containers with retrieved samples to the EPC-CP Stormwater Laboratory (TA-59-01) for any further required processing.
- [10] Return to Section 4.1, Step 11 to complete sample processing.

#### 4.4.2 Field Duplicate Samples

- [1] Review the analysis requested on the SCPL or SAP.
  - [a] Ensure the sample container volume, type, and preservation type is correct for the analysis requested (e.g., 500 mL POLY, HNO<sub>3</sub>).
  - [b] Note any deviation from the planned sample container volume, type, or preservation on the SCPL.
- [2] Field duplicate samples must be samples collected from the same location, at the same time, and in the same manner:

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 Select two sample collection bottles next to each other in the automated sampler carousel.

#### OR

- Select one sample collection bottle to split into separate sample containers
- [3] For split samples, follow these steps:
  - [a] Turn the sample collection bottle upside down multiple times to ensure sediment is loose from the bottom of the bottle.
  - [b] Pour sample into sample containers ensuring the sample remains homogenized throughout the transfer.
- [4] Return to Section 4.1, Step 11 to complete sample processing.

#### 4.5 Handling Excess Stormwater

Minimize the amount of stormwater sample brought into the EPC-CP Stormwater Laboratory. Field personnel will attempt to retrieve only the volumes needed to fulfill the requested analyses from the current MSGP SAP or program/project specific SAP.

[1] <u>IF</u> any excess stormwater sample exists after processing has been completed, <u>THEN</u> perform the following steps.

#### **Sample Processor**

- [a] Ensure the container is labeled with the site of origin, date and time sample was collected, and "Return to Site."
- [b] Place the container in the designated storage location in the EPC-CP Stormwater Laboratory.

#### **EPC-CP** technical staff

- [c] Return the sample to the site of origin as soon as possible.
- [d] Discharge at the sampler location.
- [2] <u>IF</u> the excess stormwater has been altered (e.g., tap water or preservative added), <u>THEN</u> contact the TA-59-0001 Waste Management Coordinator for further instruction.

#### 4.6 Submit Samples for Shipping to Offsite Analytical Laboratory

#### **Sample Processor**

[1] Deliver completed SCPL(s) to the MSGP Data Manager.

#### **MSGP Data Manager**

[2] Process the sample information in the EIM system.

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- [a] Capture any documented deviations from planned conditions (as noted on the SCPLs).
- [b] Generate Chain of Custody/Analysis Request (COC) form(s) and sample container labels to reflect the processed samples (see examples in Attachments 2 and 3).

#### **Sample Processor**

- [3] Ensure the sample containers are securely sealed and wiped dry.
- [4] Cross-check to ensure the Sample ID on the SCPL matches the Field Sample ID on the COC.
- [5] Compare the information from the SCPL and lid of each container and apply the correct labels to the sample containers.
- [6] <u>IF</u> the person who processed the sample is NOT submitting the samples to the SMO, <u>THEN</u>
  - [a] He/she will print and sign his/her name and the date/time samples are relinquished to the submitter in the second RELINQUISHED BY box.
  - [b] The submitter will print and sign his/her name and the date/time samples are received in the second RECEIVED BY box.

#### **EPC-CP technical staff**

- [7] Place the sample(s) in a cooler with sufficient Blue Ice® (or equivalent) to maintain the required preservation temperature (≤4° C).
  - **NOTE:** Cushioning material (e.g., bubble wrap) may be used to separate containers to avoid breakage during transport
- [8] Place the SCPL(s) and COC(s) in a zip lock type bag, seal, and place in the cooler with samples.
- [9] Transport samples to the SMO.
  - [a] Deliver samples during SMO business hours by 2pm for same day shipping.
  - [b] Coordinate with the SMO for delivery during other times or for delivery of samples that have limited holding times.
  - [c] If delivery of samples to the SMO will be delayed, place sample containers with SCPL(s) in the EPC-CP Stormwater Laboratory refrigerator and ensure the refrigerator is locked.
- [10] Complete the COC form as follows:
  - [a] On the Relinquished By line, the person submitting the sample(s) will sign and print his/her name and date/time samples are relinquished to the SMO.

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- [b] The SMO personnel accepts the sample(s) by signing and printing his/her name and recording the date/time on the Received By line.
- [11] Complete the SCPL form as follows:
  - [a] Ensure all fields are filled out with sample information or N/A. Do not leave blank fields.
  - [b] In the RELINQUISHED BY box, the person submitting the sample(s) will sign and print his/her name. Sign and print your name on the SCPL in the "Relinquished By" box.
  - [c] Record the date/time that matches the data and time RELINQUISHED BY on the COC.
  - [d] Record the COC number (e.g., 2017-xxxx) in the RECEIVED BY box.
- [12] Ensure the following steps are taken:
  - [a] SMO makes a copy of the SCPL(s) to accompany the COC and samples.
  - [b] Keep the original SCPL(s) for the MSGP program.
  - [c] Make a copy of the signed Chain of Custody/Analysis Request.
- [13] Deliver the copy of the signed COC and original SCPL(s) to the MSGP Data Manager for record keeping.

#### 5.0 TRAINING

All EPC-CP personnel that execute the activities specified in this procedure must meet the minimum qualification and training requirements for their position as identified EPC-CP-PIP-2101, NPDES Multi-Sector General Permit Program. This will include "self-study" (required reading) for this procedure as assigned and documented in accordance with ENV-DO-QP-115, *Personnel Training*. Other participating LANL groups may require training documentation pursuant to local procedures.

Contract personnel that execute the activities specified in this procedure will be qualified and trained as required by the Exhibit D and Exhibit F. In addition, contract personnel will be required to complete "self-study" (required reading) of this procedure.

Personnel performing this procedure will be familiar with the most current versions of the following procedures and operation manuals:

- EPC-CP MSGP SAP for the current monitoring year
- EPC-CP-QP-2103 Inspecting Stormwater Runoff Samplers and Retrieving Samples for the MSGP

#### 6.0 RECORDS

EPC-CP is the Office of Record for this document and must be maintained in accordance with PD1020, Document Control and Records Management and ADESH-AP-006, Records Management

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*Plan.* Records generated by this document will be submitted to the Records Management designated point of contact or document manager for document management.

Below are records generated as a result of implementing this procedure. Records generated are identified by title and type.

Record Title	QA Record	Non-QA Record
*Water Sample Collection and Processing Log/Field Chain of Custody	$\boxtimes$	
*Chain of Custody/Analysis Request	$\boxtimes$	
Copy of log book entry(s) (if a log book is used)	$\boxtimes$	
Other pertinent field or lab notes (if additional notes are required)	$\boxtimes$	

<sup>\*</sup>The original document is part of the data package QA records for the SMO. MSGP retains a copy for tracking purposes only.

#### 7.0 DEFINITIONS AND ACRONYMS

#### 7.1 Definitions

See LANL *Definition of Terms*.

#### 7.2 Acronyms

See LANL Acronym Master List.

COC	Chain of Custody/Analysis Request
EIM	Environmental Information Management
EPA	Environmental Protection Agency
EPC-CP	Environmental Protection and Compliance – Compliance Programs
LANL	Los Alamos National Laboratory
μm	Micron
mL	Milliliter
MSGP	Multi-Sector General Permit
N/A	Not Applicable
NPDES	National Pollutant Discharge Elimination System
SAP	Sample Analysis Plan
SCPL	Water Sample Collection and Processing Log/Field Chain of Custody
SMO	Sample Management Office

#### 8.0 REFERENCES

None.

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#### 9.0 ATTACHMENTS

**Attachment 1:** Water Sample Collection and Processing Log/Field Chain of Custody Example

**Attachment 2:** Sample Container Labels Example

**Attachment 3:** Chain of Custody/Analysis Request Example

### **Processing MSGP Stormwater** Samples

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#### Attachment 1: Water Sample Collection and Processing Log/Field Chain of Custody Example

(Page 1 of 1)

Los Alamos National Laboratory

#### WATER SAMPLE COLLECTION AND PROCESSING LOG/FIELD CHAIN OF CUSTODY

**EVENT ID:** 

11743

EVENT NAME: MSGP 2018

SAMPLE ID:

MSGP-18-153015

16:03

WORK ORDER: MSGP-12345

COLLECTION

DATE/TIME:

RETRIEVAL DATE/TIME:

LOCATION ID:

MSGP04301

SAMPLER TYPE: APS-R

LOCATION TYPE: WCS

SAMPLE PREP: UF

LOCATION

SYNONYM(S): NA

FIELD QC TYPE: REG

FIELD MATRIX: WT

SAMPLE USAGE: COMP.

PRIORITY	ORDER	CONTAINER	#	PRESERVATIVE	COLLECTED Y/N	SPECIAL INSTRUCTIONS	PROCESSING COMMENTS
Alu	MSGP-TSS	ML POLY	1	ICE	X	NIA	Alu

SAMPLE COMMENTS: NA

FIELD PARAMETERS:

Sample Time NA HH:MM

Visual Inspection WO# MSGP- 67890

The state of the s			
COLLECTED BY Jane Doe (Printed Name) (Signature)	Date/Time 07/03/18 09:25		
RELINQUISHED BY (Printed Name) (Signature)	Date/Time 07/03/18 10:05	RECEIVED BY (Printed Name) (Signature)	Date/Time 07/03/18 10:05
PROCESSED BY (Printed Name) (Signature)	Date/Time 07/03/18 /3:∞		
RELINQUISHED BY John Smith (Printed Name) (Signature)	Date/Time 07/04/18 08:35	RECEIVED BY (Printed Name) (Signature)  See CoC# 20(7-1326	Date/Time
RELINQUISHED BY (Printed Name) (Signature)	Date/Time	RECEIVED BY (Printed Name) N/A (Signature)	Date/Time

Report Date: 08/01/2018

<b>Processing MSGP Stormwater</b>	No: EPC-CP-QP-2106	Page 18 of 19
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# Attachment 2: Sample Container Labels Example (Page 1 of 1)

Los Alamos Natio	nal L	aborat	tory
Sample ID: MSGP-17-131786			
Container: 500 ML POLY			1 of 1
Preservative: HNO3 ICE			
Analysis: NPDES-Al-Total Recoverable	*		
Date/ 04/01/2017	Time:	16:03	

	os Alamos N	ational Labor	atory
Sample ID: N	ISGP-17-131787		
Container:	1-	1 of 1	
Preservative:	HN03 ICE		
Analysis: NP	DES-Al-Total Recover	able	-
Date/	04/01/2017	Time: 16:03	31.15

<b>Processing M</b>	SGP Stormwate	r
Samples		

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# Attachment 3: Chain of Custody/Analysis Request Example

(Page 1 of 1)

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Los Alamos NM	-	Site Name: Los Alamos National Laboratory												Page 1 of 1																																					
Client Contact:	Lab Agreen			Site	Na	me:		Los	Ala	mos	Nat	iona	La	bora	tory				_	_	-	Rad Screening Info:																													
	Project Num Analysis Tum 24 Hour - 7 Days - 14 Days - 21 Days - 28 Days -	naround Time:  Other-		-Zn		(																	_ab Reporting I	_imit Typ																											
Field Sample ID	Sample Date	Sample Time	Sample Matrix	MSGP-Zn																																															
MSGP-17-131904	Apr 1 2017	16:03	W	1																																															
MSGP-17-132187	Apr 1 2017	16:03	W	1						<										+	-																														
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ATTACHMENT 21: EPC-DO-QP-101, ENVIRONMENTAL REPORTING REQUIREMENTS FOR RELEASES OR EVENTS

EPC-DO-QP-101	Revision: <b>3</b>	Los Alamos
Effective Date: 08/07/2017	Next Review Date: 08/07/2020	NATIONAL LABORATORY —— EST. 1943

# **Environment, Safety, and Health Directorate**

# **Environmental Protection and Compliance Division – Compliance Programs**

# **Quality Procedure**

# **Environmental Reporting Requirements for Releases or Events**

#### **Document Owner/Subject Matter Expert:**

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Brian Iacona	EPC-CP	Signature on File	4-27-17
ι	Derivative Classifier: 🛛 Unc	lassified or DUSA <u>ENVPRO</u>	
Name:	Derivative Classifier: Unc	lassified or DUSA ENVPRO Signature:	Date:

#### **Approval Signatures:**

Subject Matter Expert:	Organization:	Signature:	Date:
Brian Iacona	EPC-CP	Signature on File	4-27-17
Responsible Line Manager:	Organization:	Signature:	Date:
Michael Saladen	EPC-CP, Team Leader	Signature on File	7-21-17
Responsible Line Manager:	Organization:	Signature:	Date:
	EPC-CP, Group Leader	Signature on File	8-3-17
Responsible Line Manager	Organization	Signature:	Date:
	EPC-DO, Division Leader	Signature on File	8-7-17

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<b>Environmental Reporting Requirements</b>	
for Releases or Events	

EPC-DO-QP-101	Page 2 of 23
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#### **REVISION HISTORY**

Document Number and Revision [Include revision number, beginning with Revision 0]	Effective Date [Document Control Coordinator inserts effective date]	Description of Changes [List specific changes made since the previous revision]
0	02/09	New document
1	4/10	Revision and update
ENV-DO-QP-101 R2	6/12	Biennial Review/Revision, new template implemented.
EPC-DO-QP-101 R3	08/07/17	Revision and update. This document replaces ENV-DO-QP-101 R2. New document number reflects organizational name change.

# **Environmental Reporting Requirements** for Releases or Events

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#### 1.0 INTRODUCTION

This Environmental Protection and Compliance Division (EPC-DO) procedure describes how to determine whether an unplanned release, spill, fire, or other event needs to be reported under environmental regulations and how to fulfill all immediate reporting requirements (within the first 24 hours). Emergency and abnormal event notification requirements for reporting to Laboratory and DOE management are specified in <a href="PD1200">PD1200</a>, <a href="Emergency Management">Emergency Management</a>, and <a href="P322-4">P322-4</a>, <a href="Performance">Performance</a> <a href="Improvement from Abnormal Events">Improvement from Abnormal Events</a>. Environmental reporting requirements regarding releases or other events are included in this procedure.

#### 1.1 Purpose

This procedure describes the actions that must be performed within the first 24 hours of the release. This procedure does **not** cover the response procedures for "continuous releases" under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Emergency Planning and Community Right-to-Know Act (EPCRA) (see definitions) nor the follow-up notifications and reports.

#### 1.2 Applicability

This procedure applies to EPC-DO on-call representatives and subject matter experts (SMEs) who must respond to any release, spill, or event at the Laboratory that may require immediate notification to local, state or federal regulatory agencies. For notifications to Pueblo Environmental Departments refer to ENV-DO-QP-111, Reporting Environmental Releases to Pueblo Governments.

#### 2.0 PRECAUTIONS AND LIMITATIONS

The work described in this procedure includes field work that does <u>not</u> require an Integrated Work Document (IWD) and is rated as having a **LOW hazard** level.

#### 3.0 RESPONSIBILITIES

The following personnel require training before implementing this procedure:

 EPC managers, designated on-call representatives, and SMEs who may be asked to fulfill immediate reporting requirements during release-related exercises or during actual releases

Annual retraining to this procedure is required. This procedure will be reviewed biennially by all affected personnel and updated as necessary.

Training to this procedure will be by "self-study" (reading) and is documented in accordance with the trainee's organization's procedure for training.

Actions specified within this procedure, unless preceded with "should" or "may", are to be considered mandatory (i.e., "shall", "will", "must").

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#### 4.0 WORK PROCESSES

Events covered by this procedure include detonation or burns of unstable material, leaking or compromised gas cylinders, puncturing of bulging containers, fires, explosions, chemical or radiological spills, wastewater spills, potable water discharges, and other unplanned releases at the Laboratory.

On a semi-annual basis, EPC-DO will prepare a list of individuals designated as on-call representatives and will designate the week each will be on-call. This list will be distributed to on-call representatives and Laboratory managers including Principal Associate Directorate for Operations (PADOPS), Associate Directorate for Environment, Safety, and Health (ADESH), Associate Directorate for Environmental Management (ADEM), Emergency Operations (SEO-DO), EPC-DO, Environmental Protection and Compliance Division Compliance Programs Group (EPC-CP), and Environmental Protection and Compliance Division Environmental Stewardship Group (EPC-ES). The on-call representative can be reached by pager at 505-664-7722.

#### 4.1 Responsibility of On-Call Representative

The EPC on-call representative is the party primarily responsible for:

- determining if the incident will require immediate notification to external agencies in accordance with LANL, state, and federal regulatory reporting requirements
- notifying EPC Division management of immediate reporting requirements
- if needed, coordinating with other on-call SMEs and the Emergency Operations Center (EOC) to ensure the required notifications for environmental reporting and abnormal events are being addressed for the Laboratory

The EPC on-call representative is not responsible for the following and EOC will make these determinations:

- determining if the Resource Conservation Recovery Act (RCRA) Contingency Plan must be implemented
- if a shock-sensitive material or leaking or compromised gas cylinder constitutes an emergency

However, in order to ensure that the appropriate expertise is available for the affected media, the EPC on-call representative may immediately confer with an SME of the EPC group that has programmatic responsibility. If an SME from the responsible group is able to respond to the event, the <u>remaining steps in this procedure may be passed to that person.</u>

A list of contact numbers for on-call representatives and SMEs for EPC-CP and EPC-ES groups is available in the EPC-CP group office. The EPC-DO and SEO-DO may also be contacted to determine the on-call representative for each group.

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#### 4.2 Follow-Up Reporting

This procedure describes the initial external notifications (within the first 24 hours) to regulatory agencies. After completion of the steps in this procedure, the EPC group specifically responsible for compliance with the relevant regulations will complete the required notifications and reports, as applicable under the appropriate regulations, according to established procedures.

#### 4.3 Summary of Policy Reporting

The EPC on-call representative and spill response SMEs have the authority and responsibility for deciding when to report an event and for making notifications to regulatory agencies within the applicable regulatory deadlines.

LANL management and Department of Energy Los Alamos Field Office (DOE LAFO) must be informed as soon as possible that a report was or will be made, but their approval is not required prior to the report being made to the regulatory agency. LANL management, with input from EPC SMEs, will determine if an ORPS (Occurrence Reporting Processing System) report or other type of Lessons Learned will be necessary.

**NOTE:** SEO-DO maintains a current list of on-call LANL managers.

#### 4.4 Using this Procedure

This procedure has seven separate paths (and corresponding sections) to follow for determining if a release or event is reportable. Follow each of these paths to determine if one or more are applicable:

- Resource Conservation and Recovery Act (RCRA)
- Toxic Substances Control Act (TSCA)
- Clean Water Act (CWA), New Mexico Water Quality Act (NMWQA), and New Mexico Water Quality Control Commission (NMWQCC) Regulations
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Emergency Planning and Community Right-to-Know Act (EPCRA)
- Clean Air Act
- Endangered Species Act
- Bald and Golden Eagle Protection Act
- Migratory Bird Treaty Act
- New Mexico Wildlife Conservation Act
- National Environmental Policy Act
- National Historic Preservation Act
- Native American Graves Protection and Repatriation Act

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#### Archaeological Resources Protection Act

Each release needs to be evaluated for all potential reporting requirements. For example, a Reportable Quantity (RQ), defined under CERCLA or EPCRA may not be met, **but the release may be reportable** under RCRA, New Mexico Water Quality Control Commission (NMWQCC), and/or Clean Water Act (CWA) requirements.

**NOTE:** The 24-hour deadline (immediate in some cases) applies regardless of whether it occurs during business hours, after business hours or on non-business days.

#### 4.5 Determining if a Release is Reportable under RCRA

Follow the flow chart in Attachment 1 to determine if an event is reportable under RCRA regulations.

Under the RCRA permit requirements, the SEO-DO manager determines if the "RCRA Contingency Plan" provisions should be implemented. The EPC on-call representative or an EPC-CP SME performs notifications that may be required.

The SEO-DO Manager will normally attempt to contact the EPC-CP SME for guidance in making this decision. If the EPC-CP SME is successfully contacted, the completion of the remainder of this procedure may be passed on to this individual.

The EPC on-call representative makes the determination that one or more of these conditions occurred through consultation with EPC-CP and appropriate SMEs. 24-hour notification can be made by the EPC on-call representative or by an EPC SME.

The Emergency Operations Center (EOC) manager makes the determination that unstable chemicals, leaking or compromised gas cylinders represent an emergency situation and, typically with EPC-CP, how best to respond. 24-hour notification can be made by the on-call representative or EPC-CP SME.

If a release/event is reportable under RCRA rules, determine if the release/event is reportable under other rules and proceed to the Section 4.10 *Reporting a Release or Event*.

#### 4.6 Determining if a Release is Reportable under TSCA

In practice, only spills of Polychlorinated Biphenyls (PCBs) or PCB-suspect untested mineral oil to the environment (generally outdoors or with the potential to reach the outdoors) are reportable. Spills that are contained indoors are generally not reported.

A discharge of PCBs is reportable to the Environmental Protection Agency (EPA) under TSCA if 1 pound of PCBs by weight is released [40 Code of Federal Regulations (CFR) 761.125(a)(1)]. Notify the EPA regional office and proceed with the immediate clean up requirements noted in 40 CFR 761.125(a)(1) in the shortest possible time after discovery, but in no case later than 24 hours after discovery. Additionally, reporting requirements are triggered if over 270 gallons of untested mineral oil suspected of containing PCBs has been spilled.

Follow the steps in *Determining if a Release is Reportable under CERCLA, EPCRA, or Other Regulations* to determine if the RQ for PCBs has also been exceeded.

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There are six items containing PCBs that are out of service at the Chemistry and Metallurgy Research (CMR) Building. All other known PCB equipment at the Laboratory has been taken out of service and disposed of in accordance with TSCA regulations.

If a release is reportable under TSCA, continue through the next sections to determine if the release/event is reportable under other rules and proceed to *Reporting a Release or Event* and determine if additional reporting is necessary.

#### If the spill is ...

equal to or over 1 pound by weight of PCBs (TSCA) or greater than 270 gallons of untested mineral oil suspected of containing PCBs

#### Then...

Report to the National Response Center (1-800-242-8802) immediately (within 15 minutes of discovery). Additionally, contact EPA Region 6 (Office of Prevention, Pesticides and Toxic Substances Branch) through EPA's 24-hour spill response number 866-372-7745 as soon as possible after discovery but no later than 24 hours after discovery.

#### 4.7 Determining if a Release is Reportable under the NM Water Quality Act or the CWA

#### 20.6.2.1203 New Mexico Administrative Code (NMAC) Reporting

The NM Water Quality Act (NMWQA) does not use Reportable Quantities (as described in the next section). Instead the NM Water Quality Control Commission (NMWQCC) regulations state: "With respect to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, notifications (to the New Mexico Environment Department (NMED)) and corrective actions are required."

The above rule requires the use of professional judgment to determine if reporting is required. No quantifiable metric is available to assist in making this determination. The EPC on-call representative or SME has the authority and responsibility to make this determination.

Additionally, unplanned releases of potable water or steam condensate require reporting pursuant to 20.6.2.1203 NMAC if the release is greater than 5,000 gallons, reaches a watercourse, or if the release adversely impacts a Solid Waste Management Unit (SWMU) or Area of Concern (AOC) as directed in the LANL Liquid Discharge Reporting Guidance (Decision Tree), dated March 10, 2009. Contact ADEM to confirm the location and potential impacts to SWMUs or AOCs from any releases that may occur.

#### Groundwater Discharge Permit Reporting

The Laboratory has four current Groundwater Discharge Permits (DPs) that include notification and reporting requirements in the event of an unpermitted discharge. Spills of **any volume** associated with any of the Groundwater DPs require reporting to NMED pursuant to 20.6.2.1203 NMAC.

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## 1. DP-857: Sanitary Waste Water System (SWWS) Plant, Sanitary Effluent Reclamation Facility (SERF), and Sigma Mesa Evaporation Basins. Permit Condition No. 44.

The unauthorized release of untreated and treated sanitary wastewater, reuse wastewater, blended wastewater, and reject wastewater would be subject to reporting under Condition No. 44.

#### 2. DP-1589: Septic Tank/Disposal Systems. Permit Condition No. 23.

The unauthorized release of untreated wastewater, septage, treated wastewater surfacing from failing disposal systems (leach fields), and treated wastewater surfacing from overflowing septic tanks would be subject to reporting under Condition No. 23.

#### 3. DP-1793: Land Application of Treated Groundwater. Permit Condition No. 17.

The unauthorized release of untreated or treated groundwater that does not constitute land application, as defined in <a href="EPC-CP-QP-010">EPC-CP-QP-010</a>: Land Application of Groundwater, would be subject to reporting under Condition No. 17.

## 4. DP-1835: Injection of Treated Groundwater to Class V Underground Injection Control (UIC) Wells. Permit Condition No. 22.

The unauthorized release of treated or untreated groundwater that does not constitute injection into a Class V UIC well, as defined in Discharge Permit DP-1835, would be subject to reporting under Condition No. 22.

#### Clean Water Act Reporting

Oil discharges (film/sheen/discoloration) to water in stream channels must also be reported to the National Response Center (NRC) immediately (within 15 minutes of discovery) pursuant to 40 CFR §110.6.

#### National Pollutant Discharge Elimination System (NPDES) Outfall Reporting

The EPC-DO on-call SME must provide notification to the NPDES Outfall Permit Program Lead and/or the EPC-CP Water Quality Team Leader in the event of a leak or unplanned release from an NPDES permitted outfall upon discovery in order to meet applicable reporting requirements.

#### 4.7.1 Reporting Requirement for Petroleum Storage Tanks

As defined in 20.5.7 NMAC, the NMED requires verbal reporting within 24 hours of a petroleum product release from regulated tanks to the NMED Petroleum Storage Tank Bureau (PSTB) when there is:

- any suspected or confirmed release of regulated substances
- evidence of release of regulated substances
- unusual operational conditions (that would cause concern about a release)
- monitoring results that show loss from the system

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Regulated tanks include those with a capacity between 1,320 gallons and 55,000 gallons. Regulated substances for Aboveground Storage Tanks includes, but is not limited to petroleum and petroleum-based substances comprised of a complex blend of hydrocarbons derived from crude oil through processes of separation, conversion, upgrading and finishing, such as motor fuels (including ethanol-based motor fuels), jet fuels, distillate fuel oils, residual fuel oils, lubricants, petroleum solvents, and used oils.

Notice of any suspected or confirmed release from a storage tank system needs to be completed within 24 hours. Contact the EPC-CP Aboveground Storage Tank (AST) Program Lead and/or the EPC-CP Water Quality Team Leader prior to completing any external notifications. The PSTB can be reached at 476-4397 during business hours and 827-9329 (NMED Emergency Spill Hotline) during non-business hours. A written report describing the spill, release or suspected release and any investigation or follow-up action needs to be submitted to the PSTB within 14 days of the incident.

#### 4.7.2 Additional Reporting Requirements under the NPDES Pesticide General Permit

Adverse incidents require reporting to the EPA under the NPDES Pesticide General Permit (PGP). An adverse incident is defined as an unusual or unexpected incident resulting from pesticide applications that an Operator has observed upon inspection or of which the Operator otherwise becomes aware, in which:

- 1. There is evidence that a person or non-target organism has likely been exposed to a pesticide residue, <u>and</u>
- 2. The person or non-target organism suffered a toxic or adverse effect.

The phrase <u>toxic or adverse effect</u> includes effects that occur within Waters of the United States on non-target plants, fish, or wildlife that are unusual or unexpected (e.g., effects are to organisms not otherwise described on the pesticide product label or otherwise not expected to be present) as a result of exposure to a pesticide residue, and may include:

- Distressed or dead juvenile and small fishes
- Washed up or floating fish
- Fish swimming abnormally or erratically
- Fish lying lethargically at water surface or in shallow water
- Fish that are listless or nonresponsive to disturbance
- Stunting, wilting, or desiccation of non-target submerged or emergent aquatic plants
- Other dead or visibly distressed non-target aquatic organisms (amphibians, turtles, invertebrates, etc.)

The phrase <u>toxic or adverse effects</u> also includes any adverse effects to humans (e.g. skin rashes) or domesticated animals that occur either from direct contact with or as a secondary effect from a discharge (e.g., sickness from consumption of plants or animals containing pesticides) to Waters of the United States that are temporally and spatially related to exposure to a pesticide residue (e.g. vomiting, lethargy).

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If an Operator observes or otherwise becomes aware of an adverse incident due to pesticide application, the Operator must notify the EPA Incident Reporting contact within 24 hours of the Operator becoming aware of the adverse incident. EPA Incident Reporting Contacts are listed at <a href="https://www.epa.gov/npdes/pesticide-permitting">https://www.epa.gov/npdes/pesticide-permitting</a>.

If an Operator becomes aware of an adverse incident affecting a federally listed threatened or endangered species or its federally designated critical habitat, which may have resulted from a discharge from the Operator's pesticide application, the Operator must <a href="mailto:immediately">immediately</a> (within 15 minutes of discovery) notify the U. S Fish and Wildlife Service. This notification must be made by phone to the contact listed on the EPA's website (<a href="https://www.epa.gov/npdes/pesticide-permitting">https://www.epa.gov/npdes/pesticide-permitting</a>).

#### 4.8 Determining if a Release is Reportable under CERCLA or EPCRA

Under CERCLA or EPCRA, an RQ is the threshold which requires regulatory notification of a release. An RQ is based on the quantity of chemical released within any 24-hour period. CERCLA RQs of hazardous substances are listed in 40 CFR § 302.4. If an RQ is met or exceeded, an immediate (within 15 minutes of discovery) notification must be made to the NRC (1-800-424-8802) pursuant to 40 CFR §302.6. If a release of an airborne radioactive material exceeds an RQ, the EPA Region 6 Health Physicist (Office-(214) 665-8541; Mobile-(214) 755-1530; Home-(972) 937-1900) must also be verbally notified after the NRC notifications have been completed.

A release is reportable under EPCRA if a release of a hazardous or extremely hazardous substance listed in 40 CFR Part 355 Appendices A and B occurs. The chemicals that have not been assigned RQs by the EPA have been given statutory RQs of one pound by Congress. If an RQ established under EPCRA is met or exceeded, an immediate (within 15 minutes of discovery) notification must be made to the Local Emergency Planning Committee (LEPC) community emergency coordinator and to the State Emergency Response Commission (SERC) (see Attachment 2).

The lists of CERCLA hazardous substances and EPCRA extremely hazardous substances are two separate lists that include a number of common substances. However, not all extremely hazardous substances are listed hazardous substances. In some instances, a release of an extremely hazardous substance may be reportable under EPCRA but not reportable under CERCLA.

Releases that occur within a closed space with no emissions to the ambient environment are exempt from EPCRA and CERCLA reporting requirements.

**NOTE:** Response procedures for "Continuous Releases" are not covered in this procedure.

#### 4.8.1 Regulatory Classification of the Released Material

The on-call EPC SME will determine the regulatory classification of the substance released with respect to the hazard classifications:

Extremely Hazardous Substance (EHS) and/or Hazardous Substance (HS)

Often during the course of an emergency, complete information will not be available regarding type and amount of material released. In this case, best professional judgment must be used to establish the level of confidence associated with the estimates. If the uncertainty is high enough that future

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estimates may require reporting, it is best to be conservative and report the release following the reporting requirements detailed in Section 4.10 *Reporting a Release or Event*.

After determining the RQ of a released material, the EPC on-call representative or SME will perform the following steps to determine if an RQ has been released.

Step	Action		
1	Obtain an estimate of the quantity and type of material released (e.g. 4 pounds of chlorine gas or 150 curies of tritium).		
2	Compare this quantity against the RQs provided in 40 CFR Table 302.4 and 40 CFR §355, Appendices A and B.  If this is an airborne release of radioactive materials, immediate (within 15 minutes of discovery) reporting to the NRC and the EPA Region 6, Regional Health Physicist is required if the RQ has been exceeded. Note that for radioactive materials, the RQ is provided in activity units (curies or becquerels). Also note that some materials have an RQ value for both chemica exposure (Table 302.4) and for radiological exposure (Appendix B to §302.4). In these cases, th RQ applying to the smallest quantity of material will apply.  For all radioactive material releases, a radiological dose assessment must also be performed within 24 hours of the release. This dose assessment should be made by an environmental health physicist in EPC-CP or EPC-ES. The on-call individual should contact an EPC health physicist for this evaluation.  Immediate evaluation – RQ comparison (of a radioactive material release)		
3			
	If the release	Then	
		Proceed to section 4.10 Reporting a Release or Event.	
	Is less than the RQ	No immediate reporting is required; contact EPC environmental health physicist to complete follow-up dose assessment.	
4	If this is a release of non-rad material,	it is reportable if the RQ is exceeded.	
	If the amount released is, Then		
	Equal to or greater than the RQ	Proceed to Section 4.10 Reporting a Release or Event.	
	Less than the RQ	Proceed to Step 5	
5	Continue to re-evaluate the release as new data becomes available. Perform Steps 1 throas necessary.		

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#### 4.9 Determining Release Impacts to Biological or Cultural Resources

There are laws and regulations related to protection of biological and cultural resources which are applicable to the Laboratory. These laws and regulations include:

- National Environmental Policy Act
- Endangered Species Act
- Bald and Golden Eagle Protection Act
- Migratory Bird Treaty Act
- New Mexico Wildlife Conservation Act
- New Mexico Endangered Species Act
- National Historic Preservation Act
- Native American Graves Protection and Repatriation Act
- Archaeological Resources Protection Act

Reporting of impacts to biological or cultural resources under the preceding federal laws is not specifically defined. However, the EPC on-call SME should utilize the Decision Support Application (DSA) to determine if the release impacted a Biological or Cultural Site. The DSA layer 'Federally Listed Species Habitat' contains Endangered Species habitat boundaries. The DSA 'Cultural Resources-Buffered Sites' layer contains the boundaries of the Cultural Sites (Please note-information contained in these layers is Official Use Only). Notify the respective Biological or Cultural SME within one business day if the release impacted either of these areas. The Biological or Cultural SMEs will handle any additional reporting requirements.

Additionally, if there is a release of contaminants to a wetland or destruction of a wetland, OR if the event could result in the "take" of a threatened or endangered species (i.e., a wildfire), the EPC oncall representative or SME will notify the Biological SME within one business day of the event. The Biological SME will complete any additional reporting requirements.

#### 4.10 Reporting a Release or Event

If a release or event is reportable (as determined by one or more of the previous sections), the Laboratory is required to meet certain reporting requirements. The emergency notification requirements must be followed upon determination that a release or event is reportable.

For informational purposes, a Summary of Emergency Release or Event Reporting Requirements is provided in Attachment 2. This document summarizes the primary statutes and the associated reporting requirements.

Maintain a notebook to record pertinent information about the release and to document the actions taken (see Section 5.0 *Records*).

Any release to the environment that has been determined to be reportable by the EPC on-call representative or SME shall be reported through the LANL management chain in accordance with PD1200, Emergency Management and P322-4, Performance Improvement from Abnormal Events.

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Los Alamos National Security (LANS) management and DOE shall be notified if a release notification to state or federal regulatory agencies is required. Management approval is not required prior to completing environmental notifications to the regulatory agencies in order to assure that the deadline for reporting is not exceeded.

Perform the following steps immediately after establishing that reporting is required:

Step	Action		
1	Compile release information including :		
	The source, cause, type and quantity of the release		
	Time and duration of the release		
	Extent of any protective and corrective actions taken		
	<ul> <li>Name, address, and telephone number of the person to contact for further information</li> </ul>		
	Whether the substance is an HS or EHS		
	<ul> <li>Associated health risks and medical attention necessary for exposed individuals</li> </ul>		
	<ul> <li>If available, information concerning the release of any hazardous and/or mixed waste which may endanger public or private drinking water supplies</li> </ul>		
	<ul> <li>Assessment of actual or potential hazards to human health or the environment outside the facility</li> </ul>		
	<ul> <li>If available, estimated quantity and disposition of recovered material that resulted from the incident</li> </ul>		
	<ul> <li>Precautions to take due to the release/event, including, in the case of fire, those associated with special hazards due to hazardous and/or mixed waste</li> </ul>		
	<ul> <li>Any other information which may help emergency personnel responding to the incident</li> </ul>		
	Environmental media impacted from the release		
2	Notify LANL management, DOE, and the respective Facilities Operations Division (FOD). Note:		
	Management approval is not required prior to completing environmental notifications to the regulatory agencies in order to assure that the deadline for reporting is not exceeded.		
3	Provide notification to the regulatory agency as required by the applicable regulation(s) detailed in Sections 4.5 - 4.9. Reference Attachment 2 for a summary of the applicable		
	reporting requirements.		
4	Notify programmatic SMEs that may be impacted or required to complete follow up reporting.		

#### 4.10.1 Steps to Notify LANL Management and DOE

The EPC on-call representative will complete the following steps to provide notification to LANL Management and DOE.

Step	Action
1	Determine that a release to the environment is reportable to state or federal entities as

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	required under applicable regulations.
	<b>NOTE:</b> Occurrence Reporting and Procession System (ORPS) reporting is a FOD and Responsible Associate Director (RAD) responsibility and commonly they will seek advisement from EPC SMEs.
2	Provide notification to the EPC-CP Water Quality Team Leader, the EPC-CP Group Leader, the EPC-DO Division Leader, and DOE LAFO program contact of the release and the required external notifications.
3	Complete environmental reporting to state and federal agencies in accordance with all applicable regulations.
4	Notify the appropriate program SME that may be impacted or be required to complete following up release reporting.

After all the above notifications have been made, or when requested, the EPC on-call representative or SME will hand off responsibility for additional actions and follow-up to the affected environmental group. (The group that will be responsible will depend on the type and location of the release and the governing regulations or statutes.)

In order to communicate events at LANL which may impact the public and or the environment, EPC staff may provide a courtesy notification to New Mexico Environment Department of events that may not require formal regulatory notification. Examples of such events in the past have been small wild land fires.

#### 5.0 RECORDS

The following records are generated as a result of this procedure and are maintained in accordance with ADESH-AP-006 Records Management Plan and P1020-1, Laboratory Records Management:

- Field documentation of the release, including:
  - Time and date of the release
  - Time, date, and description of notifications
  - Location and source of the release
  - Type of material released
  - Quantity of material released
  - Impacted media
  - Time release was stopped
  - Any immediate mitigation actions taken to contain or control the release
  - Documentation of any verbal notifications
  - Samples taken
- Copies of any written notifications generated

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- Documentation of any analytical results, and quality assurance of results
- Contingency and / or emergency plan documentation
- Documentation of any RCRA permit non-compliance that threatens human health and environment
- Documentation of treatment of any RCRA unstable chemicals, leaking or compromised gas cylinders

#### 6.0 DEFINITIONS AND ACRONYMS

#### 6.1 Definitions

ADESH – Associate Directorate for Environment, Safety, and Health

**ADEM** – Associate Directorate for Environmental Management

**AOC** – Area of Concern

**AST** – Aboveground Storage Tank

CAA – Clean Air Act

**CERCLA** – Comprehensive Environmental Response, Compensation, and Liability Act

**CMR** – Chemistry and Metallurgy Research

**CFR** – Code of Federal Regulations

**Continuous Release** – A release is continuous if it "occurs without interruption or abatement or if it is routine, anticipated, intermittent, and incidental to normal operations or treatment processes." The release must also be "stable in quantity and rate," which means that it must be predictable and regular in the amount and rate of emission. The response procedures for continuous releases are not covered by this document. See guidance in Reporting Continuous Releases of Hazardous and Extremely Hazardous Substances under CERCLA and EPCRA.

CWA - Clean Water Act

**DOE LAFO** – Department of Energy Los Alamos Field Office

**DSA** – Decision Support Application

**Environment** – Includes "water, air, land, and the interrelationship which exists among and between water, air, land, and all living things." (40 CFR 355.20)

**EOC** – Emergency Operations Center

**EPA** – Environmental Protection Agency

**EPC-DO** – Environmental Protection and Compliance Division

**EPCRA** – Emergency Planning and Community Right-to-Know Act

**EPC-CP** – Environmental Protection and Compliance Division Compliance Programs Group

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**EPC-ES** – Environmental Protection and Compliance Division Environmental Stewardship Group

**Extremely Hazardous Substance (EHS)** – EPCRA establishes emergency reporting requirements for extremely hazardous substances in 40 CFR 355, Appendix A. All of these substances are also CWA and CERCLA "hazardous" substances.

**FOD** – Facility Operations Director

**GWDP**-Ground Water Discharge Permit

Hazardous Substance (HS) – These substances are summarized in 40 CFR Part 302. As used in this context, refers to: (1) any elements, compounds, mixtures, solutions, or substances specially designated by EPA under Section 311 of the Clean Water Act (CWA) (40 CFR 116.4); (2) any toxic pollutants listed under Section 307(a) of the CWA; (3) any hazardous substances regulated under Section 311 (b)(2)(A) of the CWA; (4) any listed or characteristic RCRA hazardous waste (40 CFR 261), (5) any hazardous air pollutants listed under Section 112 of the Clean Air Act (CAA); or (6) any imminently hazardous chemical substances or mixtures regulated under Section 7 of the Toxic Substances Control Act (TSCA).

**IWD** – Integrated Work Document

**LANL** – Los Alamos National Laboratory

**LANS** – Los Alamos National Security

**LEPC** – Local Emergency Planning Committee

NMAC - New Mexico Administrative Code

**NMED** – New Mexico Environment Department

**NMWQA** – New Mexico Water Quality Act

**NMWQCC** – New Mexico Water Quality Control Commission

**NPDES** – National Pollutant Discharge Elimination System

**NRC** – National Response Center

**ORPS** – Occurrence Reporting and Processing System

**OSC** – On-Scene Commander

**PADOPS** – Principal Associate Directorate Operations

**PCBs** – Polychlorinated Biphenyls

**PGP** – Pesticide General Permit

**PST** – Petroleum Storage Tank

**PSTB** – Petroleum Storage Tank Bureau

**RAD** – Responsible Associate Director

**RCRA** – Resource Conservation and Recovery Act

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**Release** – Any unpermitted spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing of contaminants into the environment, excluding: (1) emissions from the engine exhaust of any vehicle, (2) certain releases of source, byproduct, or special nuclear material from a nuclear incident, or (3) normal application of fertilizer.

**RQ** – Reportable Quantity

SARA – Superfund Amendments and Reauthorization Act

**SDS** – Safety Data Sheet

**SERC** – State Emergency Response Commission

**SERF** – Sanitary Effluent Reclamation Facility

**SEO-DO** –Security and Emergency Operations Division

**SME** – Subject Matter Expert

**SWMU** – Solid Waste Management Unit

**SWWS** - Sanitary Waste Water System

**TSCA** – Toxic Substances Control Act

**UIC** – Underground Injection Control

#### 7.0 REFERENCES

The following documents are referenced in this procedure:

- 40 CFR 302, Designation, Reportable Quantities, and Notification
- 40 CFR 261, 264 Subpart D 270.30
- DOE guidance document PCB Spill Response and Notification Requirements
- (EH-231-059/1294), available on the EPC-CP web page
- DOE Office of Environmental Guidance, CERCLA Information Brief, EH-231-001-0490 (April 1990)
- EPA Web Site: http://www.epa.gov/
- EPCRA Information Web Site: http://www.chemicalspill.org/EPCRA-facilities/spill.html
- Federal Register, Volume 67, No. 47, Notices FRL-7172-4, Guidance on the CERCLA Section 101(10)H, Federally Permitted Release Definition for Certain Air Emissions
- PD1200, Emergency Management
- P322-3, Performance Improvement from Abnormal Events
- LANL RCRA Permit No. NM0890010515-1
- LANL NPDES Permit No. NM0028355

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- National Response Center (NRC) Web Site: http://www.nrc.uscg.mil/
- NMWQCC Regulations, 20.6.2 NMAC, dated December 1, 2001
- P407, Water Quality
- P1020-1, Laboratory Records Management
- ADESH-AP-006, Records Management Plan

#### 8.0 ATTACHMENTS OR APPENDICES

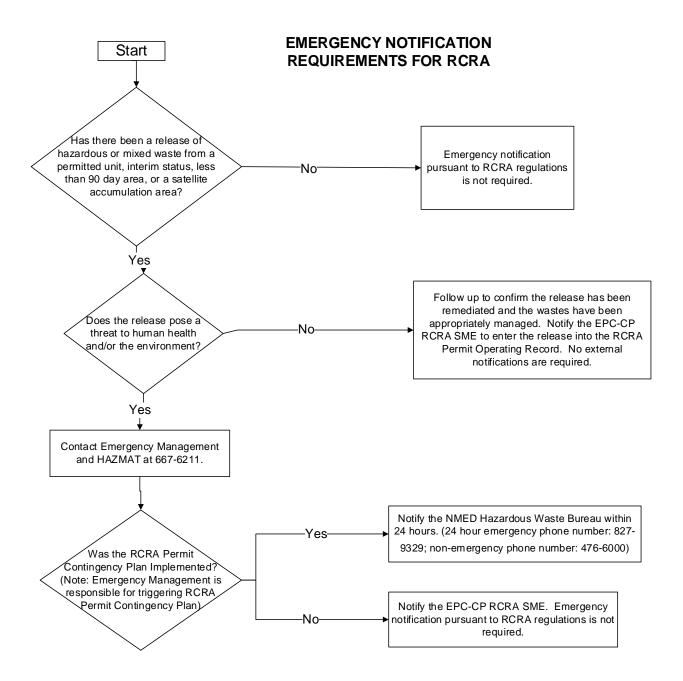
Attachment 1: Emergency Notification Requirements for RCRA

Attachment 2: Summary of Emergency Release or Event Reporting Requirements

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**Attachment 1: Emergency Notification Requirements for RCRA** 



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#### **Attachment 2: Summary of Emergency Release or Event Reporting Requirements**

**NOTE:** This is only a guide and does not cover all federal, state, or permit reporting requirements. Refer to the Code of Federal Regulations and the RCRA Permit for more details regarding these regulations.

STATUTE	REGULATIONS	INCIDENT	Immediate Reporting Requirements	Follow Up Reporting Requirements
Clean Water Act	40 CFR §110.6	Oil discharge (film/sheen/discoloration) to water surface or shoreline, or violation of water quality standards.	Immediately (within 15 minutes of discovery) notify the National Response Center.	Follow-up not required.
Clean Water Act	Part III of NPDES Permit No. NM0028355	Leak or unplanned release from an NPDES permitted outfall.	Notify the NPDES Outfall Permit Program Lead and EPC-CP Water Quality Team Leader upon discovery. The program lead or the EPC-CP Water Quality Team Leader will complete initial reporting requirements as required.	Required follow up reporting will be completed by the NPDES Outfall Permit Program Lead and EPC-CP Water Quality Team Leader.
Clean Water Act (CWA)-NPDES Pesticide General Permit	40 CFR §122.28	Adverse incident which includes evidence that a person or non-target organism has been exposed to a pesticide residue or the person or non-target organism suffered a toxic or adverse effect.	Notify the EPA Region 6 Pesticide Permitting contact (214)665-7500 within 24 hours.	Submit a 30 Day Adverse Incident Written Report to the EPA Regional Office.
New Mexico Water Quality Control Commission Regulations (NMWQCC Regulations)	20.6.2.1203 NMAC	Discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or use of the property.	Notify the New Mexico Environment Department 505-827-9329 within 24 hours.	Submit 7 and 15 Day written follow up Corrective Action Reports (Copy EPA Region 6 on the 7 and 15 Day Reports).

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STATUTE	REGULATIONS	INCIDENT	Immediate Reporting Requirements	Follow Up Reporting Requirements
New Mexico Water Quality Control Commission Regulations (NMWQCC Regulations)	20.6.2.3104 NMAC	Unplanned release of any volume from an activity or facility covered under an active Groundwater DP:  DP-857: SWWS Plant, SERF, and Sigma Mesa Evaporation Basins  DP-1589: Septic Tank/Disposal Systems  DP-1793: Land Application of Treated Groundwater  DP-1835: Injection of Treated Groundwater to Class V UIC Wells	Notify the New Mexico Environment Department 505-827-9329 within 24 hours.	Submit 7 and 15 Day written follow up Corrective Action Reports (Copy EPA Region 6 on the 7 and 15 Day Reports)
New Mexico Environmental Improvement Board Regulation	20.5.7 NMAC	A release of a petroleum product from regulated aboveground storage tank.	Contact the EPC-CP AST Program Lead and/or the EPC-CP Water Quality Team Leader prior to completing any external notifications. If required, the Petroleum Storage Tank Bureau (476- 4397) or NMED Emergency Spill Hotline (827-9329) must be contacted within 24 hours.	A written report describing the spill, release or suspected release and any investigation or follow-up action needs to be submitted to the PSTB within 14 days of the incident.
Comprehensive Environmental, Response, Compensation, and Liability Act (CERCLA)	40 CFR §302.6(a)	Hazardous substance (listed in 40 CFR Table 302.4) release (Equal to or greater than an RQ).	Immediately (within 15 minutes of discovery) notify the National Response Center 1-800-424-8802.	Follow-up not required.
Emergency Planning and Community Right- to-Know Act (EPCRA)	40 CFR§ 355.40	Release of an extremely hazardous substance (listed in 40 CFR Part 355 Appendices A and B) or CERCLA hazardous substance (listed in 40 CFR Table 302.4) equal to or greater than RQ.	Immediately (within 15 minutes of discovery) notify the LEPC (505-662-8283) the SERC (505-476-9635). Immediately notify the 911 operator for a release that occurs during transportation or from storage incident to transportation.	A written follow-up emergency notice must be submitted to the LEPC and SERC as soon as practicable after the release.

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STATUTE	REGULATIONS	INCIDENT	Immediate Reporting Requirements	Follow Up Reporting Requirements
Resource Conservation and Recovery Act (RCRA)	40 CFR 262.34, 263.30, 264.51, 264.56 & .196, 265.51, .56 & .196, 270.14, & .30, 273.17, .37 & .54, 279.43 & .53, 280.50, .52, .53, .60, &.61	Release of hazardous or mixed waste from a permitted unit, interim status, less than 90 day area or a satellite accumulation area which the RCRA Permit Contingency Plan was triggered.	Notify NMED Hazardous Waste Bureau within 24 hours (24 hour emergency phone number: 827-9329; Non-emergency phone number: 476-6000) See Attachment 1 for additional details.	Submit written report to NMED HWB within 5 days.
Clean Air Act/ Radionuclide NESHAP	40 CFR 61, Subpart H	Airborne release of radioactive material in excess of an RQ.	Notify the EPA Region 6 Health Physicist (Office- (214) 665-8541; Mobile- (214) 755-1530; Home – (972) 937-1900) immediately after providing notification to the NRC.	Follow-up not required.
Toxic Substance Control Act (TSCA)	40 CFR 761.120, 761.125	Over 1 pound by weight of PCBs (TSCA) or greater than 270 gallons of untested mineral oil suspected of containing PCBs.	Contact the National Response Center (1-800- 242-8802) and the EPA Region 6 Office of Prevention, Pesticides, and Toxic Substances Branch (1- 866-372-7745) as soon as possible after discovery, but no later than 24 hours after discovery.	Within 24 hours. Follow-up: as required by agency.

ATTACHMENT 22: ENV-CP-QP-007, SPILL INVESTIGATION

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### **Environment, Safety, Health Directorate**

## **Environmental Protection – Compliance Programs**

## **Quality Procedure**

## **Spill Investigations**

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#### **History of Revisions**

Document Number [Include revision number, beginning with Revision 0]	Effective Date [Document Control Coordinator inserts effective date]	Description of Changes [List specific changes made since the previous revision]
0	12/98	New Document.
1	06/00	Annual review, added Cerro Grande fire hazards
2	07/01	Annual review
3	06/03	Annual review
4	04/04	Annual review, changes to HCPs
5	02/07	Annual review, changes to reflect organizational restructure
6	07/08	Annual review
7	09/10	Biennial Review and revision
8	04/11	Removed prerequisites, added note re: on-call spill reporting.
9	07/13	Biennial review and revision, implemented new procedure format.
10	09/30/15	Biennial review and revision, implemented new procedure format. Controlled the updated LANL ENV-CP Unplanned Release Report.

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#### 1.0 PURPOSE

This Environmental Protection Division – Compliance Programs Group (ENV-CP) procedure describes processes and implements requirements for spill investigations.

#### 2.0 SCOPE

This procedure applies to all ENV-CP staff and personnel conducting spill investigations.

#### 2.1 HAZARD REVIEW

The work described in this procedure is <u>field work</u> and has a <u>LOW hazard</u> rating as documented by submittal of a completed <u>ENV Low Hazard Verification form</u>.

#### 3.0 RESPONSIBILITIES

The following personnel require training before implementing this procedure:

• ENV-CP staff and contract personnel who perform spill response and investigation.

Annual re-training to this procedure is required. Specific training requirements will be updated as needed.

The training method for this procedure is required reading and on-the-job training (OJT). The OJT is to be conducted by a Team Leader or person designated as Subject Matter Expert (SME) by the ENV-CP Group Leader. This training will be documented in accordance with ENV-DO-QP-115, *Personnel Training*.

Actions specified within this procedure, unless proceeded with "should" or "may," are to be considered mandatory (i.e., "shall", "will", "must").

#### 3.1 Prerequisites

None

#### 4.0 WORK PROCESSES

Responsibility is to assure the immediate mitigation and timely notification of appropriate regulatory organizations in the event of a spill or unplanned discharge that has or may affect the environment. Work requires frequent and unscheduled site visits to any area of the Laboratory during a spill or unplanned release as support staff for the on-scene Security and Emergency Operations (SEO) Incident Commander.

Specific activities associated with Spill Response and Investigation:

- Respond to the spill or unplanned release site;
- Report to the On-Scene SEO Incident Commander and Site Safety Officer;
- Receive site safety requirements;
- Provide decision support;
- Investigate the nature and extent of the spill or unplanned release;

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- Evaluate the potential environmental impact to water quality;
- Report the occurrence to the regulatory agencies, if necessary; and
- Provide support to mitigation plan and implementation.

#### 4.1 FIELD ACTIVITY

If the spill or unplanned discharge is determined to be a non-emergency event by SEO response, such as a release of potable water, perform the following steps:

Step	Action
1	Perform a site visit in coordination with the Facility
	Operations Director designee.
2	Assess potential environmental damage.
3	Provide mitigation measures and requirements.
4	Document the event.
5	Notify regulatory agencies and DOE, if necessary.
6	Facilitate collection of samples, if necessary.

For emergency response, perform the following steps:

Step	Action
1	Report to on-scene commander and await instructions.
2	Perform a site visit in coordination with SEO.
3	Adhere to access requirements as developed by the SEO Site Safety Officer and Incident Commander.
4	Identify and document the source and cause of the release.
5	Provide notification and written report if necessary.
6	Facilitate collection of samples if necessary and safe to do so.

If sample collection is required, contact the following sampling personnel:

- ENV-CP
  - NPDES outfall
  - Sanitary treatment solids
- WM-SVS
  - Wastes and chemical spills (liquid, solid, hazardous)
- ADEP Environmental Remediation Division
  - Surface water
  - Storm water runoff
  - Groundwater
  - Sediments

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If WM-SVS will collect the required sample, complete a Request For Analysis (RFA), <a href="http://int.lanl.gov/environment/waste/sampling.shtml">http://int.lanl.gov/environment/waste/sampling.shtml</a>, to schedule sampling. Specify the analytical suite and turn-around time needed for the sample in the RFA.

#### 4.2 COMMUNICATION

Take a cellular phone that will transmit from the location to be visited. Also take a contact pager to receive messages.

If cellular service is unavailable, use a portable radio set to the appropriate radio frequency.

If in a secure area where cell phone use is prohibited, use the radio. Be sure to have radio checked and authorized for use within secure areas or within the boundaries of the WFO FOD or WX Division. Government-owned cellular phones, with batteries removed, may be brought into the secure area but used only if approval is given by the SEO Incident Commander or FOD or designee. Rules of use for Smartphones and other mobile devices (BlackBerry, iPhones, iPads) can be found on the Computing Communications webpage for mobile devices, <a href="http://int.lanl.gov/computing/communications/mobile/index.shtml">http://int.lanl.gov/computing/communications/mobile/index.shtml</a>.

Radio or cellular contact must be established with a designated contact prior to leaving ENV-CP and upon arrival/departure at the site in accordance with <u>ENV-DO-QP-100</u>, <u>General Field Safety</u>.

The Incident Commander can make special communication exceptions.

All photography at LANL must adhere to <u>P217, Controlled Articles</u>.

Wastes generated from activities described in the procedure will be properly characterized, managed, and disposed in accordance with <u>P409, LANL Waste Management</u>, <u>P930-1, LANL Waste Acceptance Criteria</u>, and P403, *Environmental Risk Identification and Management*.

#### 4.3 FACILITY MANAGEMENT WORK CONTROL REQUIREMENTS FOR FIELD ACTIVITIES

Most field activities performed by the ENV-CP spill response personnel are impacted by facility management work control requirements. Requirements vary between the respective Facility Operations Divisions (FODs) and therefore necessitate ENV-CP response personnel to acquire FOD approval for site access in advance of starting work activities. The exception to this is in response to emergency situations as support to SEO staff.

Should work be required to stop/pause, reference P101-18, *Procedure for Pause/Stop Work*, for guidance.

#### 4.4 FACILITY MANAGEMENT-SPECIFIC ACCESS REQUIREMENTS

#### 4.4.1 HIGH EXPLOSIVES AREAS

TA-16 and TA-11 high explosives areas have specific access requirements. Access inside the security gate requires annual site-specific training. Curricula #5243 must be assigned and all the training courses completed before arriving at TA-16. For access, (normal or after hours) contact the WFO FOD to ensure entry requirements are met and the activity is authorized for the Plan of the Day.

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For access to WFO perimeter gates during normal working hours or after hours, contact TA-15 Access Control at 667-6742 and request permission to enter. A perimeter gate key must be picked up at the TA-15 Access Control office. Note that all outdoor firing will be suspended during entry.

For perimeter gates, prior notification for after-hours entry is also required by SOC. Perform the following steps:

Step	Action		
1	Call SOC Los Alamos at 667-4437.		
2	Identify yourself to the on duty officer or attendant.		
3	Provide the following information: Group, color and make of vehicle (s), which perimeter gate you are entering, and approximate time of arrival and finally, length of stay.		

Failure to notify security personnel in advance could result in a security violation against the visiting Team Member.

Provide notification to SOC Los Alamos at 667-4437 when leaving area.

For access to WX areas required during normal or after working hours, perform the following steps:

- Ensure the required security clearance (Q clearance) is held, and
- Contact the FOD or designee for entry requirements.

#### 4.4.2 CHEMISTRY METALLURGY RESEARCH FACILITY ACCESS

For access to the Chemistry Metallurgy Research Facility, perform the following:

- Must have the required L or Q clearance to pass the security gate.
- If access into any of the buildings is necessary, contact CMR Operations Management or the FOD for an escort.
- If responding to an emergency with SEO, ENV-CP staff will be considered part of the SEO response team, met at the access gate, and escorted to the spill site.

#### 4.4.3 TA-3-66 SIGMA FACILITY ACCESS

For access to the Sigma facility (TA-3-66), perform the following:

- For non-emergency responses, obtain prior site-specific training and authorization or contact the FOD for personnel escort and contact the FOD Deployed Environmental Professional.
- For emergency response with SEO, ENV-CP staff will be considered part of the SEO response team, met at the access gate, and escorted to the spill site. Contact the FOD to ensure they are aware of the incident.

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#### 4.5 REGULATORY SPILL REPORTING

If a spill is determined to be a threat to the environment or human health, regulatory and DOE notification may be necessary. Contacts and telephone numbers can be found on Attachment 1, ENV-CP Release Notification Phone List.

If a spill impacts a Solid Waste Management Unit (SWMU) or Area of Concern (AOC), contact ENV-CP and Environmental Remediation (ER) for possible additional notification requirements.

If ENV Division or designated SME personnel determine after a site inspection or verbal notification that a spill is non-reportable to DOE or applicable regulatory agencies, a LANL ENV-CP Unplanned Release Report must be completed (Attachment 2) and submitted to the ENV-CP SME for required documentation.

For ENV Division designated on-call personnel, follow guidance for spill reporting as described in ENV-DO-QP-101, *Environmental Reporting Requirements for Releases or Events*.

**NOTE:** On-call representatives are required to follow up in writing (email is sufficient) with the spills program lead regarding all releases during their on-call schedule. If no spills are reported in off-work hours, please confirm in writing with the spills program lead at the end of your on-call schedule.

For additional information concerning spill and unplanned discharge determination and notification requirements, contact the ENV-CP Water Quality Permitting and Compliance Team Leader.

#### 5.0 DOCUMENT CONTROL/RECORDS MANAGEMENT

The following records generated as a result of this procedure are to be submitted in accordance with <u>ADESH-AP-006 Records Management Plan</u>.

- Field notebook documentation of the release including:
  - Time and date of the release
  - Time and date of ENV-CP notification
  - Location of the release
  - Source of the release(equipment, etc,)
  - Type of material released
  - Quantity of material released
  - If an impact to a watercourse or Potential Release Site occurred
  - Time release was stopped
  - Any immediate mitigating actions implemented to contain or control the release
- Any written report and verbal notification list generated should the release be deemed reportable.
- LANL ENV-CP Unplanned Release Report (Attachment 2) for non-reportable releases.

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#### 6.0 DEFINITIONS

AOC: Area of Concern

ER: Environmental Remediation

<u>Field Work</u>: Performance of Laboratory related activities in areas that are removed or isolated from an established populated base of operation (that is, where emergency support and medical assistance is not readily available.)

**FOD:** Facility Operations Division

NPDES: National Pollutant Discharge Elimination System

**OJT**: On the job training

PRS: Potential Release Site

**SEO:** Security and Emergency Operations

SOC Los Alamos: Security contractor for Los Alamos National Laboratory

**SWMU:** Solid Waste Management Unit

#### 7.0 REFERENCES

None

#### 8.0 ATTACHMENTS

Attachment 1- ENV-CP Release Notification Phone List

Attachment 2- LANL ENV-CP Unplanned Release Report

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#### **ATTACHMENT 1- ENV-CP RELEASE NOTIFICATION PHONE LIST**

## Los Alamos National Laboratory ENV-CP

#### Release notification phone list

#### August 2015

#### **Los Alamos National Laboratory**

(1)	Security and Emergency Operations	
	Emergency Management (SEO-EM)	667-6211
(2)	ENV-ES Group Office	665-8855
(3)	ENV-CP Group Office	667-0666
(4)	ENV-DO	667-2211
(5)	LANL Central Alarm Station (SOC-LA)	667-7080
	L.A. Fire Department	667-4055

#### **New Mexico Environment Department**

See Web address below

(1)	NMED Emergency Hotline (24 hours a day)	827-9329
(2)	NMED Non-Emergency Hotline (During business hours)	476-6000
	NMED Non-Emergency Hotline (Voicemail; 24 hours a day)	1(866) 428-6535
(3)	NMED Surface Water Quality Bureau	827-0187
	Erin Trujillo	827-0418
(4)	NMED Ground Water Quality Bureau	827-2900
	Greg Huey	827-6891
	Steven Huddleson	827-2936
	Gerald Knutson	827-2996
(5)	NMED Hazardous Waste Bureau	476-6000
	Ruth Horowitz	476-6025

#### **U.S Environmental Protection Agency**

(1)	US EPA Region 6 Spill Reporting (During business hours)	1(800) 887-6063
	Emergencies- Contact the NRC	1(800) 424-8802
(2)	Gladys Gooden-Jackson	1(214) 655-7494

#### **U.S. Department of Energy**

(1	) Gene Turner	667-5794

#### **State Emergency Response Commission (SERC) Notification**

New Mexico State Police	(505) 827-9300 (During business hours)
(Immediate Notification)	(505) 827-3476 (24 hours a day)

New Mexico Department of Homeland Security and Emergency

Management (Follow-up Notification) (505) 476-9600

#### **National Response Center**

U.S. Coast Guard National Response Center	1-800-424-8802

See NRC web address below for report form

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#### **New Mexico State Police**

New Mexico State Police (505)827-9300 (During business hours)

(505) 827-3476 (24 hours a day)

#### **Local Emergency Planning Committee (LEPC) LAPD**

Philmont Taylor (505) 663-3511

## On Call Environmental Contact for Releases Group Representatives for Notifications to External Agencies

Name	Group	Work	Pager	Cellular	Email address
		Phone		Phone	
Jake Meadows	ENV-CP	606-0185	664-1333	231-0460	jmeadows@lanl.gov
Mike Saladen	ENV-CP	665-6085		699-1284	saladen@lanl.gov
Mark Haagenstad	ENV-CP	665-2014		699-1733	mph@lanl.gov
Tim Zimmerly	ENV-CP	664-0105	664-1237	699-7621	tzimmer@lanl.gov
Terrill Lemke	ENV-CP	665-2397		699-0725	tlemke@lanl.gov

#### Web addresses:

NMED home page <a href="http://www.nmenv.state.nm.us">http://www.nmenv.state.nm.us</a>

National Response Center home page <a href="http://www.nrc.uscg.mil/Default.aspx">http://www.nrc.uscg.mil/Default.aspx</a>

Reportable Quantities web page <a href="http://homer.ornl.gov/rg/">http://homer.ornl.gov/rg/</a>

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#### ATTACHMENT 2- LANL ENV-CP UNPLANNED RELEASE REPORT

#### Los Alamos National Laboratory Environmental Compliance Programs (ENV-CP) Unplanned Release Report

Form Completed By: Tel	ephone:		Group:	
Spill Details Spi	ll Owner	(Specify): □LANS, LLC	□Subcontractor:	
Date of Spill/Date Spill Discovered:				
Location:				
Material Spilled:		Anti-freeze/coolant	☐ Gasoline	
☐ Hydraulic Fluid		Steam Condensate Lubricants/oils	□ Other:	
☐ Potable Water ☐ Diesel		Refrigerant Oil		
Volume Spilled:		Waste Volume Ge	enerated:	
Source of Spill:		Hydraulic Line	□ Radiator	
Vehicle ID: Equipment ID:		Potable Water Line Fire Suppression System	☐ Condensate Line ☐ Other:	
Equipment ID.		Fuel Tank	L Ouer.	
			s taken to contain the spill, and steps/spill control eted and describe actions taken to prevent spill	
Did the spill enter or impact any of the		□ Floor Drain, if so please ind	dicate affected facility	
following? (Check as many as apply)				
following? (Check as many as apply)  RCRA Treatment Storage Disposal Fac	cility	□ Watercourse/drainage area,	if so please indicate	
following? (Check as many as apply)	cility	□ Watercourse/drainage area,		
following? (Check as many as apply)  RCRA Treatment Storage Disposal Fac RCRA Satellite Accumulation Area	cility	□ Watercourse/drainage area,	if so please indicate	
following? (Check as many as apply)  RCRA Treatment Storage Disposal Fac RCRA Satellite Accumulation Area		□ Watercourse/drainage area, □ Solid Waste Management U	if so please indicate	
following? (Check as many as apply)  RCRA Treatment Storage Disposal Face RCRA Satellite Accumulation Area RCRA <90 Day Storage Area  Did the spill occur inside or outside a build Did the spill occur on:	ing?	□ Watercourse/drainage area, □ Solid Waste Management U □ None □ Inside Concrete	if so please indicate  Unit/Area of Concern, if so please indicate  Outside  Asphalt	
following? (Check as many as apply)  RCRA Treatment Storage Disposal Face RCRA Satellite Accumulation Area RCRA <90 Day Storage Area  Did the spill occur inside or outside a build	ing?	□ Watercourse/drainage area, □ Solid Waste Management U □ None □ Inside  Concrete Carpeted Floor	if so please indicate  Jnit/Area of Concern, if so please indicate  Outside  Asphalt Graveled/Rocky Area	
following? (Check as many as apply)  RCRA Treatment Storage Disposal Face RCRA Satellite Accumulation Area RCRA <90 Day Storage Area  Did the spill occur inside or outside a build Did the spill occur on:	ing?	□ Watercourse/drainage area, □ Solid Waste Management U □ None □ Inside Concrete	if so please indicate  Unit/Area of Concern, if so please indicate  Outside  Asphalt	
following? (Check as many as apply)  RCRA Treatment Storage Disposal Factor RCRA Satellite Accumulation Area RCRA <90 Day Storage Area  Did the spill occur inside or outside a build Did the spill occur on: (Check as many as apply)	ing?	□ Watercourse/drainage area, □ Solid Waste Management U □ None □ Inside Concrete Carpeted Floor Tile Wooden floor/deck	if so please indicate  Unit/Area of Concern, if so please indicate  Outside  Asphalt Graveled/Rocky Area Soil/Vegetated Area	
following? (Check as many as apply)  RCRA Treatment Storage Disposal Factorial RCRA Satellite Accumulation Area RCRA < 90 Day Storage Area  Did the spill occur inside or outside a build Did the spill occur on: (Check as many as apply)  Samples Collected:	ing?	□ Watercourse/drainage area, □ Solid Waste Management U □ None □ Inside Concrete Carpeted Floor Tile Wooden floor/deck	if so please indicate  Unit/Area of Concern, if so please indicate  Outside  Asphalt Graveled/Rocky Area Soil/Vegetated Area Other:	
following? (Check as many as apply)  RCRA Treatment Storage Disposal Factor RCRA Satellite Accumulation Area RCRA <90 Day Storage Area  Did the spill occur inside or outside a build Did the spill occur on: (Check as many as apply)  Samples Collected:	ing?	□ Watercourse/drainage area, □ Solid Waste Management U □ None □ Inside Concrete Carpeted Floor Tile Wooden floor/deck	if so please indicate  Unit/Area of Concern, if so please indicate  Outside  Asphalt Graveled/Rocky Area Soil/Vegetated Area Other:	
following? (Check as many as apply)  RCRA Treatment Storage Disposal Factorial RCRA Satellite Accumulation Area RCRA < 90 Day Storage Area  Did the spill occur inside or outside a build Did the spill occur on: (Check as many as apply)  Samples Collected:	Soil Air Other:	□ Watercourse/drainage area, □ Solid Waste Management U □ None □ Inside  Concrete Carpeted Floor Tile Wooden floor/deck  If sa	if so please indicate  Unit/Area of Concern, if so please indicate  Outside  Asphalt Graveled/Rocky Area Soil/Vegetated Area Other: amples were collected, indicate analytical suite:	
following? (Check as many as apply)  RCRA Treatment Storage Disposal Factor RCRA Satellite Accumulation Area RCRA <90 Day Storage Area  Did the spill occur inside or outside a build Did the spill occur on: (Check as many as apply)  Samples Collected:  None  Water  Certification	Soil Air Other:	□ Watercourse/drainage area, □ Solid Waste Management U □ None □ Inside  Concrete Carpeted Floor Tile Wooden floor/deck  If sa	if so please indicate  Unit/Area of Concern, if so please indicate  Outside  Asphalt Graveled/Rocky Area Soil/Vegetated Area Other: amples were collected, indicate analytical suite:	
following? (Check as many as apply)  RCRA Treatment Storage Disposal Factor RCRA Satellite Accumulation Area RCRA <90 Day Storage Area  Did the spill occur inside or outside a build Did the spill occur on: (Check as many as apply)  Samples Collected:  None  Water  Certification  I certify that I am knowledgeable about the info	Soil Air Other:	□ Watercourse/drainage area, □ Solid Waste Management U □ None □ Inside  Concrete Carpeted Floor Tile Wooden floor/deck  If sa	if so please indicate  Unit/Area of Concern, if so please indicate  Outside  Asphalt Graveled/Rocky Area Soil/Vegetated Area Other: amples were collected, indicate analytical suite:	
following? (Check as many as apply)  RCRA Treatment Storage Disposal Factor RCRA Satellite Accumulation Area RCRA <90 Day Storage Area  Did the spill occur inside or outside a build Did the spill occur on: (Check as many as apply)  Samples Collected:  None  Water  Certification    certify that   am knowledgeable about the inference of Certifying Official:	Soil Air Other:	□ Watercourse/drainage area, □ Solid Waste Management U □ None □ Inside  Concrete Carpeted Floor Tile Wooden floor/deck  If sa	if so please indicate  Unit/Area of Concern, if so please indicate  Outside  Asphalt Graveled/Rocky Area Soil/Vegetated Area Other: amples were collected, indicate analytical suite:	

ATTACHMENT 23: EPC-CP-QP-2110, MSGP STORMWATER POLLUTION PREVENTION PLAN PREPARATION AND MAINTENANCE

EPC-CP-QP-2110	Revision: <b>0</b>	• Los Alamos
Effective Date: 01/07/2020	Next Review Date: 01/07/2023	NATIONAL LABORATORY EST.1943

Environment, Safety, Health, Quality, Safeguards, and Security Directorate Environment Protection and Compliance – Compliance Programs Group Quality Procedure

# MSGP Stormwater Pollution Prevention Plan Preparation and Maintenance

Hazard Grading:	⊠ Low	Moderate	High/Complex		
Usage Level:	□ Reference	UET	Mixed: UET Sections:		
Status:	⊠ New	Major Revision	Minor Revision		
	Review w/No	Changes	Other:		
Safety Basis:	⊠ N/A	USQ	USI Number:		
		Document Author	/Subject Matter Expert:		
Name:		Organization:	Signature:	Date:	
Holly L. Wheeler		EPC-CP	Signature on File	1-6-2020	
Derivative Classifier: 🛛 Unclassified or 🗌					
Name:		Organization:	Signature:	Date:	
Steven E. Wolfel		EPC-CP	Signature on File	1-6-2020	
Approval Signatures:					
EPC-CP Reviewer:		Organization:	Signature:	Date:	
Terrill W. Lemke, Te	am Leader	EPC-CP	Signature on File	1-7-2020	
EPC-CP RLM:		Organization:	Signature:	Date:	
Taunia Van Valkenb	urg, Group Leader	EPC-CP	Signature on File	1-7-2020	

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### MSGP Stormwater Pollution Prevention Plan Preparation and Maintenance

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#### **REVISION HISTORY**

	Effective Date	
<b>Document Number and Revision</b>	[Document Control	
[Include revision number, beginning	Coordinator inserts	Description of Changes
with Revision 0]	effective date]	[List specific changes made since the previous revision]
EPC-CP-QP-2110, Rev. 0	01/07/2020	New document

### MSGP Stormwater Pollution Prevention Plan Preparation and Maintenance

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#### 1.0 INTRODUCTION

The Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit (MSGP), also referred to as the Permit, contains specific requirements for industrial activities of Los Alamos National Laboratory (LANL) covered by the permit. One requirement is the preparation, maintenance, and routine revision of a Stormwater Pollution Prevention Plan (SWPPP).

#### 1.1 Purpose

Active MSGP facilities must be included in a SWPPP. The SWPPP is intended to document the selection, design, and installation of control measures to meet permit effluent limits. Additional documentation required by the Permit is to be kept with the SWPPP (including inspection maintenance, monitoring, and corrective action) and is intended to document the implementation of permit requirements.

#### 1.2 Scope

This procedure contains information and specific steps for preparing a SWPPP, and identifying and documenting conditions in order to meet Permit requirements. Part 5 of the Permit contains specific requirements for developing, maintaining, and revising a SWPPP for facilities with stormwater discharge associated with industrial activities permitted under an MSGP. Part 5.5 describes the additional documentation required to be kept with the SWPPP.

#### 1.3 Applicability

This procedure applies to Environmental Protection and Compliance-Compliance Programs (EPC-CP) technical staff, Deployed Environmental Professionals (DEPs), and subcontractor personnel (as applicable) who develop and maintain SWPPPs at MSGP regulated LANL facilities operated by Triad, LLC.

#### 2.0 PRECAUTIONS AND LIMITATIONS

The hazard rating for the activities described in this procedure is **LOW** and does not require an Integrated Work Document.

#### 3.0 PREPARING AN MSGP STORMWATER POLLUTION PREVENTION PLAN

Part 5 of the Permit contains the specific requirements for developing, maintaining, and revising a SWPPP. At a minimum, the SWPPP must contain the following elements:

- Stormwater pollution prevention team (Stormwater PPT);
- Site description (including a site map);
- Summary of potential pollutant sources;
- Description of control measures;

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- Schedules and procedures;
- Documentation to support eligibility considerations under other federal laws; and
- Signature requirements.

Where the SWPPP refers to procedures in other facility documents, such as a Spill Prevention, Control and Countermeasure Plan or an Environmental Management System, copies of the relevant portions of those documents must be kept with the SWPPP.

The template provided in Attachment 1, EPC-CP-QP-2110 R0 Form 1, MSGP SWPPP Template Example contains the elements required in a LANL MSGP SWPPP. Contact the MSGP Program Lead for questions regarding content.

#### 3.1 Gathering Information for the SWPPP

#### **SWPPP Preparer**

- [1] Contact the MSGP Program Lead for a copy of the most current SWPPP template.
- [2] Obtain a copy of the previous year's SWPPP for reference (if one is available).
- [3] Review the SWPPP template.
  - [a] Identify information that will need to be included in the SWPPP (e.g., MSGP sector, operational areas, Pollution Prevention Team member names, etc.).
  - [b] Identify documents that will need to be attached to the SWPPP (e.g., certifications, memorandums, maps, data summaries, endangered species reports, etc.).
- [4] Identify documents and/or reports that are provided by EPC-CP.
  - [a] Contact the MSGP Program Lead with a request for needed information.
- [5] Obtain maps as specified in the SWPPP template.
  - [a] Request a new map or update to existing map from the MSGP Program Lead.
  - [b] Provide a draft or map markup with information as required in the Permit.

#### 3.2 Preparing the SWPPP

#### **SWPPP Preparer**

- [1] Use a copy of the most current SWPPP template.
- [2] Add information to the relevant sections.
- [3] Text highlighted in yellow indicate areas to be replaced with facility specific information.

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- [a] <u>IF</u> text is part of an instruction (e.g., Insert site description text here.)

  THEN delete the entire line and replace with the appropriate information.
- [b] <u>IF</u> text is embedded as part of the line,

  <u>THEN</u> replace just the yellow highlighted text with appropriate information (e.g., delete <u>Sector XX-(Insert Sector Title)</u> and replace with <u>Sector P Land Transportation & Warehousing</u>).
- [4] Delete attachments that are not applicable to the active facility specific SWPPP.
- [5] Attach other documentation (e.g., Spill Prevention, Control and Countermeasure Plan, Environmental Management System, copies of relevant portions of documents) as necessary.
- [6] Send the draft SWPPP to the EPC-CP MSGP Program Lead and request a review.
  - **NOTE 1:** The EPC-CP MSGP Program Lead may delegate the review to personnel in the Storm Water Permitting/Compliance Team.

#### **MSGP Program Lead or Designee**

- [7] Review the SWPPP to ensure information required by the Permit is included.
  - [a] Encourage the use of the MSGP SWPPP Review Guidance Checklist as a best management practice to cross-check SWPPP content with the Permit. See checklist example in Attachment 2.
  - [b] Provide comments to the SWPPP Preparer.

#### **SWPPP Preparer**

- [8] The Preparer must resolve review comments with the MSGP Program Lead.
- [9] Obtain the signature of a duly authorized representative (refer to Appendix B, Subsection 11 of the Permit) on the certification statements associated with the SWPPP and attachments (refer to Attachment 9 of the MSGP SWPPP Template Example).
  - NOTE 2: The Review & Approval System for Scientific and Technical Information (RASSTI) system requires upload of only PDF documents. It is highly recommended that all final certifications obtained contain a written signature rather than electronic signature. The RASSTI system adds a cover page to the document containing the LA-UR number, which obviates all electronic signatures due to the document change.

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#### 4.0 MAINTAINING THE MSGP SWPPP

#### 4.1 Availability of the MSGP SWPPP

A complete copy of the current SWPPP is required to be kept at the active facility in an accessible format. The SWPPP must be immediately available to facility employees, EPA, and other entities identified in the Permit. The SWPPP must also be made available to the public. LANL meets this requirement by posting SWPPPs to the Public Reading Room internet web page. Refer to Part 5.4 of the Permit for more information.

#### **SWPPP Preparer**

- [1] Submit the final certified SWPPP in PDF format to the RASSTI system at rassti.lanl.gov.
  - [a] The SWPPP must be identified as Los Alamos Unlimited Release, or LA-UR, to be posted to the Public Reading Room.
  - [b] Identify a derivative classifier to review the document.
  - [c] Identify the document for a **full classification review**. The Designated Unclassified Subject Area, or DUSA, system may **NOT** be used.
  - [d] Identify a line manager for an approval signature.
  - [e] Identify the document for release to Public Reading Room.
- [2] Add the cover page containing the LA-UR number generated by the RASSTI system to the SWPPP.
- [3] Contact the RASSTI staff for questions and assistance using this system.

#### 4.2 Additional Documentation Requirements

The Permit requires additional documentation to be kept with the SWPPP that together keep records complete and up-to-date, and demonstrate full compliance with the conditions of the Permit. Some documents may be generated when a SWPPP is first written (e.g., copy of the permit). Other documents may be generated on an ongoing basis throughout a calendar year (e.g., inspections). Refer to Part 5.5 of the Permit for additional information.

#### **SWPPP Preparer or Owner**

- [1] <u>IF</u> any of the following documents are generated, <u>THEN</u> add the document to the facility SWPPP as soon as the document is generated and finalized (i.e., all signatures have been obtained).
  - A copy of the Notice of Intent to Discharge (NOI) submitted to EPA and correspondence exchanged between Triad, LLC and EPA specific to coverage under the permit;

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**NOTE:** There may be several modifications to the NOI during a permit term. Ensure you coordinate with the MSGP Program Lead to confirm all modifications are included in the SWPPP.

- A copy of the acknowledgement received from the EPA assigning the NPDES permit identification number
- · A copy of the permit;
- Documentation of maintenance and repairs of control measures (refer to Part 2.1.2.3 of the Permit);
- All inspections, including Routine Facility Inspections and Quarterly Visual Assessments (refer to Parts 3.1.2 and 3.2.2 of the Permit);
- Description of any deviations from the schedule for visual assessments and/or monitoring, and the reason for the deviations (refer to Parts 3.2.3 and 6.1.5 of the Permit);
- Corrective action documentation (refer to Part 4.4 of the Permit);
- Documentation of any benchmark exceedances and the type of response to the exceedance employed;
- Documentation to support any determination that pollutants of concern are not expected to be present above natural background levels if stormwater is discharged directly to impaired waters; and
- Documentation to support any claim that the facility has changed its status from active to inactive and unstaffed.

### 5.0 REVISING THE MSGP SWPPP

The Permit specifies conditions that trigger a SWPPP review to ensure numeric and non-numeric effluent limits are met and to determine if modifications to stormwater controls are necessary (refer to Parts 4.1 and 4.2 of the Permit).

The SWPPP must also be modified based on corrective actions and deadlines required under Part 4.3 of the Permit, and documented in accordance with Part 4.4 of the Permit.

At a minimum, the SWPPP must be reviewed and revised once per calendar year, and no later than 45 days after conducting the final routine facility inspection for the year.

### **SWPPP Preparer or Owner**

- [1] The Stormwater PPT will review the SWPPP for the following at a minimum.
  - The selection, design, installation, and implementation of control measures.
  - Sources of pollution.

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- Spill and leak procedures.
- Non-stormwater discharges (as applicable).
- [2] <u>IF</u> any of the following conditions occur or are detected during an inspection, monitoring or other means,

<u>THEN</u> the Stormwater PPT must **immediately** review the SWPPP as specified above.

- Unauthorized release or discharge (e.g., spill, leak, discharge of non-stormwater not authorized by the permit);
- A discharge violates a numeric effluent limit (refer to Table 2-1 of the Permit);
- Controls measures are not stringent enough for discharge to meet applicable water quality standards or the non-numeric effluent limits in the permit;
- A required control measure was never installed, installed incorrectly, or not in accordance with Parts 2 and/or 8, or is not properly operated or maintained;
- Whenever a visual assessment shows evidence of stormwater pollution (e.g., foam, oil sheen, etc.).
- Construction or a change in design, operation, or maintenance at the facility that significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged;
  - **NOTE 1:** Changes include building removal or replacement, BMP removal or installation, outfall removal or creating a new outfall, changing drainage pathways or the path of stormwater flow.
- The average of four quarterly sampling results exceeds an applicable benchmark.
  - **NOTE 2:** If less than four benchmark samples have been taken, but the results are such that an exceedance of the four quarter average is mathematically certain this is considered a benchmark exceedance.
- [3] The Stormwater PPT must determine the modification(s) to be made to implement or maintain control measures and/or take corrective action.
- [4] The revision/modification(s) will be implemented at the facility.
- [5] The SWPPP will be revised/modified within 14 days of completion of a modification or corrective action to reflect the modification(s) made.
- [6] Obtain a signature and date from a duly authorized representative on all SWPPP revisions/modifications in accordance with Appendix B, Subsection 11 of the Permit.

### 6.0 TRAINING

The following personnel require training before implementing this procedure.

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- Deployed Environment, Safety, and Health Group and Team Leaders
- EPC-CP MSGP stormwater compliance personnel
- DEPs
- Other LANL or subcontract personnel identified as being required to prepare and maintain MSGP SWPPPs as part of their job duties

All EPC-CP personnel that execute the activities specified in this procedure must meet the minimum qualification and training requirements for their position as identified EPC-CP-PIP-2101, NPDES Multi-Sector General Permit Program. This will include "self-study" (required reading) for this procedure as assigned and documented in accordance with ADSH-TPP-301, ADESH Training Program Plan. Other participating LANL groups may require training documentation pursuant to local procedures.

Contract personnel that execute the activities specified in this procedure will be qualified and trained as required by the Exhibit D and Exhibit F. In addition, contract personnel will be required to complete "self-study" (required reading) of this procedure.

### 7.0 RECORDS

MSGP SWPPPs are signed and certified by a duly authorized representative of the individual facilities. These completed documents are maintained at the permitted facility, managed by the facility's Records Management designated point-of-contact or document manager, and posted to the LANL public reading room. The MSGP team may retain a copy for reference purposes.

Below, are records generated as a result of implementing this procedure. Records generated are identified by title and type.

Record Title	QA Record	Non-QA Record
Stormwater Pollution Prevention Plan	$\boxtimes$	
MSGP SWPPP Review Guidance Checklist	N/A	N/A

### 8.0 DEFINITIONS AND ACRONYMS

### 8.1 Definitions

See LANL Definition of Terms.

**Best Management Practice (BMP)** – Schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of "waters of the United States." BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage (40 CFR Part 122.2).

**Control Measure** – Any BMP or other method (including effluent limitations) used to prevent or reduce the discharge of pollutants to waters of the United States.

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### 8.2 Acronyms

See LANL Acronym Master List.

EPA	Environmental Protection Agency
EPC-CP	Environmental Protection and Compliance-Compliance Programs
DEP	Deployed Environmental Professional
DUSA	Designated Unclassified Subject Area
LANL or the Laboratory	Los Alamos National Laboratory
LA UR	Los Alamos Unlimited Release
MSGP or Permit	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
NOI	Notice of Intent to Discharge
SWPPP	Stormwater Pollution Prevention Plan
PDF	Portable Document Format
PPT	Pollution Prevention Team

### 9.0 REFERENCES

Unites States Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated With Industrial Activity (MSGP)

Federal Register, Final National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Industrial Activities. Federal Register: June 16, 2015, Volume 80, Number 115

Clean Water Act, Title 33 U.S.C. 1251

### 10.0 ATTACHMENTS

Attachment 1: EPC-CP-QP-2110 R0 Form 1, MSGP SWPPP Template Example

**Attachment 2:** MSGP SWPPP Review Guidance Checklist Example

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### **MSGP Stormwater Pollution Prevention Plan**

## **Insert Facility Name**

Triad National Security, LLC Los Alamos National Laboratory

XX/XX/XXXX

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# Insert Name of Facility STORMWATER POLLUTION PREVENTION PLAN

#### PREFACE

This Stormwater Pollution Prevention Plan (SWPPP) was developed in accordance with the provisions of the Clean Water Act (33 U.S.C. §§1251 et seq., as amended), and the *United States Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP)* (U.S. EPA, June 2015) issued by EPA. The SWPPP uses the industry specific permit requirements for *Sector XX-(Insert Sector Title)* as a guide. The applicable stormwater discharge permit is EPA General Permit Identification Tracking Number NMR050013 [Triad National Security, LLC (Triad)]. Click here to view contents of the 2015 Multi-Sector General Permit.

This SWPPP applies to discharges of stormwater from the operational areas of (List the operational areas) at Los Alamos National Laboratory. Los Alamos National Laboratory (also referred to as LANL or the "Laboratory") is owned by the Department of Energy (DOE), and is operated by Triad. Throughout this document, the term "facility" refers to (Insert facility name). The current MSGP expires at midnight on June 4, 2020.

### 1.0 FACILITY DESCRIPTION

### 1.1 Facility Information

Name of Facility: (Insert facility name e.g., TA-3-22 Pow	ver and Steam Plant	t <mark>)</mark>
Street: P.O. Box 1663		
City: Los Alamos	State: NM	ZIP Code: 87545
County: Los Alamos		
NPDES ID (i.e., permit tracking number): NMR050013		
Primary Industrial Activity SIC code, and Sector and Subs SIC XXXX, Sector X, Subsector XX	sector (2015 MSGP,	Appendix D and Part 8):
Estimated area of industrial activity at site exposed to st	ormwater: XX acre	S
Discharge Information		
Name(s) of surface water(s)/segment that receives storn	mwater from your f	acility: Sandia Canyon
(Sigma Canyon to NPDES outfall 001). Note: For Roads a	nd Grounds also ad	d "and Mortandad Canyon
(within LANL)". Note: For Asphalt Batch Plant alone, dele	ete Sandia Canyon i	nformation and insert only
"Mortandad Canyon (within LANL)."		
Does this facility discharge industrial stormwater directly	y into any segment	of an "impaired water"
(see definition in 2015 MSGP, Appendix A)? ⊠Yes	No	
Pollutants causing the impairment: (Insert pollutants: lis	t can be found in th	ne Triad Notice of Intent

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Pollutants causing the impairment (see above) that may be present in industrial stormwater discharges from this Facility:

Are any of your stormwater discharges subject to effluent limitation guidelines (ELGs) (2015 MSGP Table 1-1)?  $\Box$ Yes  $\Box$ No

If Yes, which guidelines apply? (Note: Asphalt Batch Plant is subject to ELGs) Not applicable.

### 1.2 Stormwater Pollution Prevention Team (PPT)

#### Insert a description of the team

The specific duties of individual team members of the PPT are listed in the table below.

Staff Names	Individual Responsibilities
Group Leader:  Name Title, Organization	Responsible for the management of all environmental, safety, health, and quality programs for the yards, buildings and facilities within this Plan. This includes performing oversight and periodic walk downs to ensure implementation of the requirements of the MSGP and this SWPPP including overseeing the assigned duties of other PPT members. The Group Leader is responsible for ensuring problems noted during inspections are corrected. The Group Leader must also ensure adequate resources are obtained to ensure compliance requirements of the MSGP and this SWPPP are met.
Deployed Environmental Professional (DEP):  Name Title, Organization	Responsible for the management of all environmental programs and issues for the yards, buildings and facilities listed within this Plan. The DEP is responsible for training, recordkeeping, and SWPPP revision. The DEP ensures documentation of inspections and other required MSGP records relative to the SWPPP are managed in accordance with the Permit and established document control procedures and that the SWPPP is kept current. The DEP provides technical and regulatory support to facility and operations personnel regarding implementation of the MSGP and this SWPPP. Lastly, the DEP conducts routine facility inspections and if necessary, visual assessments, in accordance with the Permit. Identified conditions requiring corrective actions from routine facility inspections are entered into the Environmental Protection and Compliance-Compliance Programs (EPC-CP) Corrective Action Report (CAR) database. The DEP is responsible for tracking and updating the status of corrective actions that cannot be implemented immediately.
Facility Operations Division (FOD) Manager: Name Title, Organization	Responsible for managing the maintenance and operation of all aspects of the yards, buildings and facilities listed within this Plan. The manager shall provide review and ensure coordination with core personnel and the PPT, as appropriate, when tenants within

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	the FOD propose new processes, operations, features, or a new
	site that may be subject to the MSGP.
EPC Core:	The MSGP Program Lead is responsible for managing and
Name	administering the MSGP Program for all industrial facilities
Title, Organization	operated by Triad within Los Alamos National Laboratory. The
Title, Organization	MSGP Program Lead advises and provides guidance to facility or
	operations personnel on NPDES MSGP regulations/requirements.
	The Program Lead also acts as the institutional point of contact for
	all interactions with the regulatory authority (EPA) and supervises
	personnel implementing stormwater monitoring requirements for
	the facility.
Operations Manager(s):	Responsible for day-to-day operations at the facility. Assists the
Name	DEP and EPC with inspections; spill reporting; implementing,
Title, Organization	installing and maintaining storm water controls (also known as
inde, Organization	Best Management Practices) (BMPs); and providing
	documentation as requested by other team members. The
	Operations Manager is key to ensuring adequate communication
	and coordination of issues regarding implementation of the MSGP
	and this Plan. Operations Managers also assist the DEP/EPC with
	SWPPP training and/or briefings, as requested.

### 1.3 Site Description

Insert text with site description. Include information on type of operation(s), industrial operating equipment (associated with the Asphalt Batch Plant and the TA-3-22 Power and Steam Plant), main structures, activities, outfalls, and substantially identical outfalls.

### 1.4 General Location Map

The general location map for the facility can be found in Figure A. Figure B-X (if you have more than one site map, list them all here) contains all site maps and identifies all receiving waters associated with stormwater discharges from the facility. X percent of the site flows to (Insert canyon name). The canyon at this location is a (Insert stream type e.g., perennial, ephemeral, intermittent) and eventually flows to the Rio Grande approximately X miles southeast of the site.

#### 1.5 Site Map

The site map is provided as Figure B-X (if you have more than one site map, list them all here) and illustrates the facility's activities: including facility boundary, structures, impervious surfaces, industrial activity areas, spills, operational areas, drainage patterns, stormwater controls, monitoring locations, outfalls and nearby receiving streams.

As required by the 2015 MSGP, the following information specific to the facility is either shown on the site map or contained with additional information provided in this SWPPP.

- Site boundaries and acreage. The site covers approximately X acres.
- Significant structures and impervious surfaces. The site is X percent impervious, primarily structures and paved lots.

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- Direction of stormwater flow and site drainage. Direction of flow is indicated with arrows.
- Locations of stormwater control measures.
- Locations of all receiving waters. In the immediate vicinity of the facility, (Indicate if any of the
  waters are Impaired and, if so, whether the waters have TMDLs established for them. See
  paragraph below this list). Also, indicate if the receiving water includes a wetland. A map of
  nearby receiving waters is provided as Figure B-X.
- Locations of all stormwater conveyances. This includes all ditches, pipes, and swales.
- · Locations of potential pollutant sources.
- · Locations of significant spills or leaks.
- Locations of all stormwater monitoring points.
- Locations of stormwater inlets and outfalls. Of which each will require a unique identification
  code for each outfall (e.g., Outfall 005, etc.), indicating if you are treating one or more outfalls as
  "substantially identical" and an approximate outline of the areas draining to each outfall.
- This facility is not associated with a municipal separate storm sewer system (MS4).
- Areas of designated critical habitat for endangered or threatened species. There are (Insert
  "no areas" or a number of areas) in the direct vicinity of the facility. However, a map for
  threatened and endangered species within LANL property is included as Figure B-X.
- Locations of the following activities where such activities are exposed to precipitation:
  - Insert all facility activities exposed to stormwater (e.g., fueling locations; loading/unloading areas; locations used for the treatment, storage, or disposal of wastes; liquid storage tanks; processing and storage areas; machinery; location and sources of run-on to the site; transfer areas for substances in bulk; immediate access roads used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility; and vehicle and equipment maintenance and/or cleaning areas. Only include the activity areas specific to the facility (for example, if you do not refuel within the active facility boundary, do not include "fueling locations" in this bulleted list). Use a secondary bullet list level in this section.

### 2.0 POTENTIAL POLLUTANT SOURCES

Industrial activities that could potentially result in releases to the environment are summarized in 2.1 below. The site map for the facility is provided in Figure B-1.

Insert text describing structures and industrial activities that could potentially result in a release to the environment. Include information on location (e.g. inside, outside), associated containment, protection (e.g., roofed areas or coverings), and other devices or practices to prevent or contain spills, prevent runon and run-off.

### 2.1 Potential Pollutants Associated with Industrial Activity

List specific areas and activities that could potentially result is a release to the environment and the constituents that may be released. Include a list of any Solid Waste Management Units and Areas of Concern (also known as Consent Order Sites or Potential Release Sites) with a description of each and associated potential pollutants/contaminants.

### 2.2 Spills and Leaks

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Insert information on spill and leak history at the facility, if any. Text may be in table format as shown below.

Date	Description	Outfall(s) Affected

Insert information on areas where spills and leaks could occur at the facility. Text may be in table format as shown below.

Specific Equipment/Industrial Activity Areas and	Outfall(s) Affected
Location	

In the event of any future spill or leak at any of the facility areas, a spill report, documenting the occurrence and the nature of the spill or leak, will be completed. The spill report will be filed promptly upon completion and documentation of the spill clean-up, and will be summarized in this section of the SWPPP. In addition, spills within MSGP facility boundaries will be entered as conditions requiring corrective action in the MSGP CAR database and will be updated as corrective action occurs, in accordance with EPC-CP-QP-022, MSGP Corrective Actions.

The probability of spills or releases at the facility is minimized by (Insert information on how the facility will minimize spills and leaks).

### 2.3 Unauthorized Non-Stormwater Discharges

Insert information describing any NPDES permitted non-stormwater discharges, unpermitted outfalls, or unauthorized discharges associated with the facility. Describe any potential sources of non-stormwater discharges (e.g., testing of fire hydrants) and where wastewater drains to. Include a reference to the "Non-Stormwater Discharge Assessment and Certification" and indicate that it is provided in Attachment 3.

#### 2.4 Salt Storage

Insert text describing salt storage areas at the facility, if present. If none exists, state salt is not stored at the facility.

#### 2.5 Historical Data Summary

The following tables provide monitoring data at the facility for the past X years.

Permitted Facility: (insert facility name)

Calendar Year XXXX

Contact MSGP Program Lead to obtain this information formatted for insertion.

**Note:** This information will be updated every year during the annual SWPPP update, to include the 3 most current years of monitoring data.

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#### 3.0 STORMWATER CONTROL MEASURES

Control measures at the facility are designed to minimize the potential release of pollutants that could adversely affect water quality. Insert text with stormwater control measure information.

### 3.1 Non-Numeric Technology-Based Effluent Limits

Insert text with non-numeric technology-based effluent limits information. Note: This is specific to Sectors A, AA, N, O and P.

#### 3.1.1 Minimize Exposure

Insert text describing all structural controls (structures or covers) or practices used to minimize the exposure of industrial activities to precipitation. The SWPPP must describe where the controls or practices are being implemented at the facility. Examples of exposure-minimizing control measures include: location and extent of grading, berms, curbs used to contain contaminated stormwater or divert it around areas of industrial activity, materials stored within secondary containment, location of spill cleanup kits, schedule for employee spill abatement and cleanup training, procedure or practices for storage of leaky vehicles and equipment.

#### 3.1.2 Good Housekeeping

Good housekeeping practices specifically applicable to the prevention of stormwater contamination include the following measures: Insert text describing any practices implemented to keep exposed areas at the facility clean. Describe where each practice is being implemented at the facility. Examples of good housekeeping control measures include how workspaces are maintained; routine inspections of heavy equipment, other equipment and waste containers; inspections of material storage areas; identifying specific personnel/positions responsible for empting drip pans, etc. Refer to Section 4.1 of this document for specific schedules for waste and recyclable material pickup and sweeping.

All site areas exposed to precipitation are walked down during daily operations and monthly routine facility inspections to ensure that the grounds are kept in an orderly condition. The outdoor metal storage areas are inspected to ensure all piping and metal raw material is off the ground on storage racks and covered, or stored inside buildings, sheds or transportable containers. Vehicle and forklift parking areas are inspected for leaks or spills as well as storage areas containing oil-filled equipment. The entire site, including loading areas and outfalls, are inspected for floatable debris, garbage, waste and all other potential pollutants. All dumpsters and roll-off bins are inspected to ensure they are closed.

#### 3.1.3 Maintenance

Control measures at the facility will be kept in effective operating condition by the implementation of scheduled preventive maintenance, standard operating procedures (SOPs), engineering guidance, and manufacturer's specifications as applicable. If control measures need to be replaced or repaired to maintain compliance with the 2015 MSGP, necessary modifications will be made according to the timelines specified in the *Corrective Action and Deadlines* requirements of Section 6.0 of this SWPPP.

Deficient items identified during routine facility inspections, walk-downs, or by any other means of identification, will be documented on the routine facility inspection forms and entered into the MSGP CAR database. The condition requiring corrective action will remain open until proper maintenance or

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corrective action has been completed. CAR information, along with documentation of maintenance/repair of control measures, is in Attachment 9 of the SWPPP.

Insert text identifying how industrial equipment is maintained to avoid leaks or other releases. Also, include information on how site-specific control measures are maintained to ensure effective operating condition.

#### 3.1.4 Spill Prevention and Response

Spills, leaks, or other releases will be prevented and minimized by (insert information on how the facility prevents and minimizes unauthorized releases).

#### Insert text describing the general facility approach to spill cleanup.

All spills or releases are reported to EPC-CP by using the spills pager (505) 664-7722. Although incidental spills may be cleaned up by facility personnel, all emergency spills or releases are reported to Emergency Management Division-Emergency Response (EMD-ER) and/or the Facility Duty Officer by calling 667-2400. If fire or explosion is present, or if the potential for such exists, the situation must be reported by dialing 911 from a non-cellular phone or by activating a fire pull box. In the event of a spill, EMD-ER will coordinate appropriate cleanup procedures and EPC-CP will notify the individuals or organizations responsible for completing spill reports and providing information needed to fulfill regulatory reporting requirements.

Unauthorized releases or discharges within industrial facility boundaries are entered into the MSGP Corrective Action Reporting database in accordance with EPC-CP-QP-022, MSGP Corrective Actions. In addition, the completion of an Unplanned Release Report is required in the event of a spill. The report will be submitted to EPC-CP personnel and handled according to internal spill record keeping procedures. Spills may be "reportable" (requiring external agency notification) depending on the nature of the spilled material and the location of the release. External agency notification may consist of verbal and/or written notification to the National Response Center, Environmental Protection Agency Region VI, or the New Mexico Environment Department (NMED). EMD-ER, the FOD and EPC-CP, in accordance with Laboratory and DOE policies and federal and state regulatory reporting requirements, will make the determination for the type of reporting required. EPC-DO-QP-101, Environmental Reporting Requirements for Releases or Events is used for this purpose (see Attachment 21).

Copies of internal spill reports are maintained by the responsible organization and in the EPC-CP database. The EPC-CP procedure for spill reporting and response, ENV-CP-QP-007, *Spill Investigations*, can be found in Attachment 22 of this SWPPP.

### 3.1.5 Erosion and Sediment Control

Insert text describing how erosion at the facility and sediment transport off the facility is prevented/minimized. Erosion control measures that prevent soil or sediment from becoming mobilized should be used as the primary line of defense. Sediment control measures that trap, infiltrate, or settle out mobilized sediments, should be used to back-up the erosion control measures.

#### 3.1.6 Management of Runoff

Insert text describing how the facility manages stormwater runoff. This will include a description of controls used to divert, infiltrate, reuse, contain, or otherwise reduce stormwater runoff. Installed or utilized control measures may be listed with a description of their function at the facility.

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#### 3.1.7 Salt Storage Piles or Piles Containing Salt

Insert text describing how the facility manages salt storage piles or piles containing salt. Offloading operations should occur within contained areas with appropriate measures in place to prevent off-site migration or track out of salt from the contained area. Installed or utilized control measures may be listed with a description of their function at the facility. If none exists, state salt is not stored at the facility.

#### 3.1.8 Dust Generation and Vehicle Tracking of Industrial Materials

Insert text describing how the facility manages dust generation and vehicle tracking.

#### 3.2 Numeric Effluent Limitations Based on Effluent Limitations Guidelines

Insert information identifying the facility as meeting or not meeting the industrial category requirements for effluent monitoring as listed in Part 2.1.3 (*Table 2-1 Applicable Effluent Limitation Guidelines*) of the 2015 MSGP and if benchmark monitoring is or is not required.

If the permit does identify sector-specific requirements for the facility, insert a description of specific controls implemented at the facility to ensure numeric effluent limits are met.

### 3.3 Water Quality-Based Effluent Limitations and Water Quality Standards

Impaired waters monitoring is performed annually at the facility as listed in Section 4.7 of this SWPPP. The pollutants monitored can change yearly based on the requirements of the MSGP. The table in Section 4.7 lists the current year monitoring requirements and standards.

Stormwater from (insert facility name) discharges to (insert canyon name). Insert information on canyon reaches identified as impaired waters, pollutants causing the impairment, and approved or established TMDLs for the canyon. Also, insert specific information relative to the controls measures used to ensure discharges from industrial activities meet the water quality standards.

Refer to Section 4.7 for specific actions that will be taken when a water quality standard is exceeded.

### 4.0 SCHEDULES AND PROCEDURES

Preventative maintenance of control measures used to comply with the Permit effluent limits can avoid situations that result in discharges to the environment. Part 5.2.5 of the 2015 MSGP specifies control measures will have a schedule or frequency for maintenance and procedures specifying how maintenance is conducted. Part 5.5 requires documentation of maintenance and repairs including the date(s) of regular maintenance. See Attachment 10 for the Scheduled Maintenance Log.

### 4.1 Good Housekeeping

Insert a schedule for housekeeping activities such as waste and recyclable material (scrap metal, wood tires) pickup, street sweeping, etc. and identify any procedures used to ensure this occurs.

#### 4.2 Maintenance

Insert a discussion of and schedule for preventative or regular maintenance of equipment such as oil/water separators, culvert clean outs, other control measures, etc. Note: Industrial equipment will be

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maintained so that leaks and other releases are avoided. All control measures will be maintained in effective operation condition.

#### 4.3 Spill Prevention and Response

Insert a discussion of and schedule for preventing and responding to spills and leaks such as regular maintenance of equipment, placing pans under heavy equipment, and maintaining spill kits. Also, specify cleanup equipment, procedures and spill logs, and identify how often employees are trained in spill response procedures, as appropriate.

#### 4.4 Frosion and Sediment Control

Insert a discussion of and schedule for preventative or regular maintenance of erosion, sediment and velocity control measures. If polymers and/or other chemical treatments are used as erosion or sediment control measures, identify them and include a regular schedule for reapplication. Also, include a schedule for restocking these materials to ensure the facility does not run out.

#### 4.5 Employee Training

Employee training is essential for effective implementation of the SWPPP and MSGP requirements. The goals for the training program are to ensure that employees: (1) are aware of what happens when pollutants come in contact with stormwater; (2) are familiar with and will implement the requirements of this SWPPP; (3) are capable of preventing spills; (4) respond safely and effectively to an accident when one occurs; (5) recognize when there is an issue with a control measure; (6) recognize when additional control measure are necessary; and (7) identify situations that could lead to stormwater contamination.

Per Part 2.1.2.8 of the 2015 MSGP, training relevant to the SWPPP and MSGP is required for all workers at the facility that work in areas where industrial materials or activities are exposed to stormwater (MSGP sites); workers, managers, and supervisors who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel); and all members of the PPT. Training is designed to ensure these personnel understand the MSGP and SWPPP requirements, as well as their specific responsibilities regarding these requirements.

Training provided and assigned to these personnel cover both the specific control measures used at the facility; along with monitoring, inspection, planning, reporting, and documentation requirements described in this SWPPP. Training will be conducted at least annually. The DEP, Deployed Environment Safety and Health (DESH) Group Leader and Pollution Prevention Team members are responsible for ensuring all appropriate personnel receive this training. It is suggested to add a list of job titles per facility that require training (e.g., Mechanics, Heavy Equipment Operators, PPT members, Operations Manager(s), etc.).

Training activities are documented in accordance with LANL's Training Standards. In cases where training is formalized enough to require specific curricula and reoccurrence, the training activity will be recorded in LANL's official U-TRAIN database. Informal briefings, such as those included in-group safety meetings are not typically recorded in U-TRAIN. Sign-in sheets are used to document attendance and will be kept on file in Attachment 11 of this SWPPP.

The topics in this SWPPP that are covered in the latest version of the facility-specific annual MSGP training (see Attachment 11) include the following:

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- · Overview of the SWPPP contents;
- Spill response and cleanup procedures, good housekeeping, maintenance requirements, and material management practices to prevent stormwater pollution;
- The location of all controls on the site required by this permit and how they are maintained;
- The proper procedures to follow with respect to the permit's pollution prevention requirements; and
- · When and how to conduct inspections, record applicable findings, and take corrective actions.

#### 4.6 Routine Facility Inspections and Quarterly Visual Assessments

Routine inspections at this facility are conducted and documented monthly in accordance with EPC-CP-QP-023, MSGP Routine Facility Inspections (Attachment 16).

Visual assessments are conducted in accordance with EPC-CP-QP-<mark>064, MSGP Stormwater Visual Assessments (Attachment 18).</mark>

### 4.6.1 Routine Facility Inspections

At least once each calendar year, the routine facility inspection is conducted during a period when a stormwater discharge is occurring. A qualified member of the PPT (typically the DEP, a representative from the EPC-CP Storm Water Permitting/Compliance Team or EPC-CP Program Lead) performs the inspection. The 2015 MSGP consolidates the different and separate documentation requirements in the Comprehensive Site Inspection Procedures and Routine Facility Inspection Procedures from the 2008 MSGP. EPC-CP will perform at least one routine inspection per year in order to evaluate corrective action status for the Annual Report requirements.

Routine inspections will evaluate the following areas, at a minimum:

- Areas where industrial materials or activities are exposed to stormwater;
- Areas identified in the SWPPP and those that are potential pollutant sources;
- Areas where spills and leaks have occurred in the last three years;
- Discharge points(outfalls/Substantially Identical Outfalls (SIOs); and
- · Control measures used to comply with the effluent limits contained in this permit.
- Specific areas of the facility to be inspected are described in Section 2.1.

During routine inspections, the following must be examined and looked for:

- Industrial materials, residue or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks and other containers;
- Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site;
- Tracking or blowing of raw, final or waste materials from areas of no exposure to exposed areas;
   and
- Control measures needing maintenance, repairs or replacement.

Inspections performed by the PPT member are documented by completing the routine facility inspection form, which identifies all conditions requiring corrective action and other potential stormwater pollution issues that were encountered. All conditions requiring corrective actions identified during the inspection are addressed in accordance with Section 6.0 *Corrective Actions and Deadlines* of this plan. Facility personnel or the DEP may also perform daily, weekly, or other periodic facility surveys (walk downs)

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between monthly routine inspections to ensure compliance with the SWPPP and MSGP. Completed routine facility inspection forms are provided in Attachment 7 of this SWPPP and meet the requirements listed in the 2015 MSGP (Part 3.1.2.).

### 4.6.2 Quarterly Visual Assessments

Once each quarter, (April 1-May 31, June 1-July 31, August 1-September 30, October 1-November 30) a stormwater sample is obtained and visual assessment performed at each outfall, if a measureable storm event occurred. A qualified member of the PPT (DEP, EPC-CP field team member or MSGP Program Lead) conducts the visual assessment. The visual assessment will be:

- Of a sample in a clean, clear colorless glass or plastic container and examined in a well-lit area;
- On samples collected within the first 30 minutes of an actual discharge from a storm event or as soon as practicable thereafter. Alternatively, document why it was not possible to collect the sample within the first 30 minutes (i.e. adverse conditions, not enough flow, etc.); and
- Conducted at least 72 hours since the last storm event; or document that the 72-hour period is representative of local storm events during the sampling period.

Note: Snowmelt samples need only be collected during a period of measurable discharge.

The visual assessment will inspect for the following water quality characteristics: color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of stormwater pollution.

Exceptions to visual assessments:

- Document rationale if a visual assessment is unable to be collected in a quarter (no precipitation event or adverse conditions, etc.);
- Perform an additional assessment during the next qualifying storm event if unable to perform in a particular quarter; and
- Perform one quarterly assessment during snowmelt discharge (taken during a measurable discharge from the site).

For facilities with substantially identical outfalls, quarterly visual assessments may be performed at only one of the outfalls, provided that you perform visual inspections on a rotating basis at each substantially identical outfall.

The PPT member performing the visual assessment documents potential stormwater pollution problems that were observed during the assessment on the quarterly visual assessment form. Any required corrective actions identified during the assessment are addressed in accordance with Section 6.0 *Corrective Actions and Deadlines* of this plan. Completed quarterly visual assessments are provided in Attachment 8 of this SWPPP and meet the requirements listed in the 2015 MSGP (Part 3.2.2).

### 4.7 Monitoring

Analytical monitoring comprised of Impaired Waters [insert Effluent Limitation Guideline monitoring for industrial activity identified in Tables 1-1 and 6-1 of the 2015 MSGP (for example the Asphalt Batch Plant)] monitoring is performed annually on stormwater discharges from the site. Benchmark constituents are monitored quarterly. Monitoring occurs when storm events result in an actual discharge from the site and follow the preceding measurable storm event by at least 72 hours (3 days), unless documented that the storm event is representative of local storm events during the sampling

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period. For runoff from snowmelt, the monitoring is performed at a time when a measurable discharge from the site occurs.

Monitoring is conducted according to test procedures approved under 40 CFR Part 136. Runoff samples are collected by taking a minimum of one grab sample from a discharge, collected within the first 30 minutes of a measurable storm event. If it is not possible to collect the sample within the first 30 minutes of a measurable storm event, the sample is collected as soon as practicable after the first 30 minutes and documentation is kept with the SWPPP explaining why it was not possible.

LANL is located in a high elevation, semi-arid climate where the majority of rainfall occurs during a period between July and September. Freezing conditions that would prevent runoff from occurring for extended periods may also occur during the winter months. If adverse weather conditions prevent the collection of a sample according to the relevant monitoring schedule, a sample will be collected during the next qualifying storm event or as soon as practicable.

Monitoring occurs at automated sampling station [insert automated sampler identifier (e.g., MSGP07501)] as identified in Section 1.5. Discharge from the facility is (insert cardinal direction) to (insert canyon name) (impaired waters), which is a tributary of the Rio Grande located approximately X miles east of the facility.

Outfall (insert substantially identical outfall identification number) is "substantially identical" to Outfall (insert monitored outfall identification number) based on (insert the following information: industrial activities conducted in the drainage area, description of control measures implemented in the drainage area of each outfall, description of exposed material located in the drainage area of each outfall that are likely to be significant contributors of pollutants to stormwater discharges, and an estimate of the runoff coefficient of the drainage areas). Outfall locations are shown on the site map provided in Figure B-1. Note: Delete this paragraph if the facility has no substantially identical outfalls. If the facility has multiple maps, reference them all.

Monitoring will continue annually for constituents associated with impaired waters until a constituent is no longer detected in stormwater samples.

If the impaired water or benchmark constituent value exceeds the New Mexico Water Quality criterion (insert or ELG value is exceeded, if applicable), the Pollution Prevention Team will:

- Review the selection, design, installation, and implementation of control measures to determine
  if modifications are necessary to meet the effluent limits;
- Implement the necessary modifications within the timeframe specified for corrective action; and
- Continue benchmark or annual monitoring of the constituent (as required by Part 6.2 of the 2015 MSGP);
- If an ELG is exceeded, follow-up monitoring within 30 calendar days (or during the next qualifying runoff event) of implementing corrective action(s) is required. When follow-up monitoring exceeds the applicable effluent limitation, an exceedance report is submitted to EPA and monitoring continues at least quarterly, until the discharge complies with the effluent limit.

For each monitoring event, except snowmelt monitoring, the following information will be recorded and maintained through work orders, LANL database systems, and Discharge Monitoring Records:

- · The date, exact place, and time of sampling or measurements;
- The date and duration (in hours) of the rainfall event
- Rainfall total (in inches) for that rainfall event

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- The individual(s) who performed the sampling or measurements;
- The date(s) analyses were performed
- The individual(s) who performed the analyses;
- · The analytical techniques or methods used; and
- The results of such analyses.

All records of monitoring information, including all calibration and maintenance records are maintained for a minimum period of at least three years from the date the permit expires.

Insert information on quarterly benchmark and annual Impaired Waters or Effluent Limitation Guideline monitoring required for facility and benchmark pollutants to be sampled.

LANL's applicable stormwater monitoring procedures can be found in the following Attachments:

- EPC-CP-QP-047, Inspecting Stormwater Runoff Samplers and Retrieving Samples for the MSGP (Attachment 19)
- EPC-CP-QP-2106, Processing MSGP Stormwater Samples (Attachment 20).

The table on the following page lists the current Summary of Monitoring Requirements. The monitoring values have been modified to reflect New Mexico water quality standards and are based on the most protective water quality standards from the Standards for Interstate and Intrastate Surface Waters (effective on February 28, 2018), 20.6.4.900 NMAC; and as set forth in Part 9.6.2.1 of the 2015 MSGP.

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**Summary of Monitoring Requirements** 

Outfalls: (insert outfall numbers)

Contact MSGP Program Lead to obtain this information formatted for insertion.



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#### 5.0 DOCUMENTATION FOR ELIGIBILITY CONSIDERATIONS UNDER OTHER FEDERAL LAWS

#### 5.1 Endangered Species

The Final Site-Wide Environmental Impact Statement (EIS) for the Operation of Los Alamos National Laboratory (DOE/EIS-0380) was issued in May 2008, and a Record of Decision in September 2008. Stormwater issues and associated pollution prevention requirements and activities at LANL are analyzed in Chapters 4 and 5 of the 2008 Site-Wide EIS. These activities are integrated into environmental reviews on a project-specific level through LANL's Integrated Review Tool (IRT), which incorporates both the Excavation Permit (EX-ID) and Permit Requirements Identification (PR-ID) process. Stormwater issues are identified and pollution prevention activities are implemented during the design and construction phases of all LANL projects, and as part of facility operations, including routine maintenance. LANL staff monitors stormwater pollution prevention compliance at MSGP sites in accordance with Section 4.7 *Monitoring* of this plan. Corrective actions are taken as necessary as described in Section 6.0 *Corrective Actions and Deadlines* of this plan.

Part 5.2.2 of the 2015 MSGP requires areas of designated critical habitat for endangered or threatened species, as applicable, be included in the SWPPP. The *Threatened and Endangered Species Habitat Management Plan for Los Alamos National Laboratory* (LA-UR-17-29454) was last updated in October 2017 (see Attachment 13). This document provides a management strategy for the protection of threatened and endangered species and their habitats on LANL property. The MSGP IPaC Trust Resource Report (see Attachment 14) is also attached for informational purposes.

### 5.2 Historic Properties

In August, 2015 and December 2008, the Cultural Resources Team (using GPS spatial data as well as conducting visual inspections), reviewed the Laboratory industrial sites (see list below) and their associated outfalls and monitoring stations subject to the 2015 Multi-Sector General Permit (Permit #NMR050000) for effects on historic properties. All of these sites were found to be undertakings of no effect and in compliance with Section 106 of the National Historic Preservation Act (i.e., Criterion B).

- TA-3-22 Power and Steam Plant
- TA-3-38 Metals Fabrication Shop
- TA-3-38 Wood Shop
- TA-3-39 and 102 Metal Shop
- TA-3-66 Sigma Complex
- TA-60 Asphalt Batch Plant
- TA-60-1 Heavy Equipment Yard
- TA-60 Material Recycle Facility
- TA-60 Roads and GroundsTA-60-2 Warehouse
- TA-54 RANT

#### 6.0 CORRECTIVE ACTIONS AND DEADLINES

When any of the following conditions occur or are detected during an inspection, monitoring or any other means, this SWPPP (e.g., sources of pollution; spill and leak procedures; non-stormwater discharges; the selection, design, installation and implementation of control measures) is reviewed and

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revised (as appropriate). The purpose is to ensure effluent limits of the 2015 MSGP permit are met and pollutant discharges are minimized:

- An unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by this or another NPDES permit to a water of the U.S.) occurs at the facility;
- · A discharge violates a numeric effluent limit;
- Control measures are not stringent enough for the discharge to meet applicable water quality standards or non-numeric effluent limits;
- An inspection identifies that a required control measure was never installed, was installed incorrectly or is not being properly operated or maintained; and
- Whenever a visual assessment shows evidence of stormwater pollution.

When any of the following conditions occur, a review of the selection, design, installation, and implementation of control measures is performed to determine if modifications are necessary to meet the effluent limits in this permit:

- Construction or a change in design, operation, or maintenance at the facility significantly
  changes the nature of pollutants discharged in stormwater from the facility, or significantly
  increases the quantity of pollutants discharged; or
- The average of 4 quarterly sampling results exceeds an applicable benchmark. If less than 4 benchmark samples have been taken, but the results are such that an exceedance of the 4 quarter average is mathematically certain (i.e., if the sum of quarterly sample results to date is more than 4 times the benchmark level) this is considered a benchmark exceedance, triggering this review (see Section 4.7); or
- If an impaired water constituent exceeds the NM Water Quality criterion (see Section 4.7).

When the review identifies the need to modify the SWPPP, it will be revised within 14 calendar days of completion of the associated condition requiring corrective action.

### 6.1 Immediate Actions

When a condition requiring corrective action is identified, all reasonable steps necessary to minimize or prevent the discharge of pollutants are immediately taken (i.e. spill clean-up, scheduling repairs) until a permanent solution (if needed) can be implemented. Immediate action means all reasonable steps are taken the same workday or no later than the following workday (when it is too late in the day to take corrective action).

### 6.2 Subsequent Actions

When additional corrective actions are required (e.g. installing or making operational a new or modified control, completing repairs, ordering BMPs) they will be completed by the next storm event, if possible, or within 14 calendar days (from initial discovery). When it is determined that it is infeasible to complete corrective actions within 14 days, documentation of infeasibility and a schedule for completion of the work is documented in the CAR database, which will be completed no later than 45 days (from initial discovery). When it is determined that corrective actions will exceed 45 days, EPA is notified and provided justification of why actions will exceed the timeframe; and a minimal amount of additional time to complete the work may be approved.

#### 6.3 Corrective Action Documentation

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Upon discovery, conditions requiring corrective action are documented by the DEP or EPC-CP on a Routine Facility Inspection Form and/or entered into the CAR database. The action will be kept open in the database until the issue has been resolved. Documentation of maintenance and repairs of stormwater control measures (BMPs) will be kept in Attachment 10 of this SWPPP. Where corrective actions result in changes to procedures or controls documented in this SWPPP, modifications to the SWPPP are made accordingly within 14 calendar days of completing the corrective action(s). LANL procedure EPC-CP-QP-022, MSGP Corrective Actions can be found in Attachment 17.

### 7.0 ACRONYMS

ВМР	Best Management Practice
CAR	Corrective Action Report
DEP	Deployed Environmental Professional
DESH	Deployed Environmental Safety and Health
DOE	Department of Energy
EIS	Environmental Impact Statement
ELG	Effluent Limitation Guidelines
EMD-ER	Emergency Management Division-Emergency Response
EPA	Environmental Protection Agency
EPC-CP	Environmental Protection and Compliance – Compliance Programs
FOD	Facility Operations Division
IPaC .	Information for Planning and Consultation
LANL or the Laboratory	Los Alamos National Laboratory
MSGP or Permit	Multi-Sector General Permit
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
PPT	Pollution Prevention Team
SWPPP	Stormwater Pollution Prevention Plan
URL	Uniform Resource Locator

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8.0 SWPPP CERTIFICATION

## STORMWATER POLLUTION PREVENTION PLAN

(Insert Facility Name)
Los Alamos National Laboratory

#### CERTIFICATION STATEMENT

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

Signature	Date
(Insert Printed Name)	
(Insert Title)	

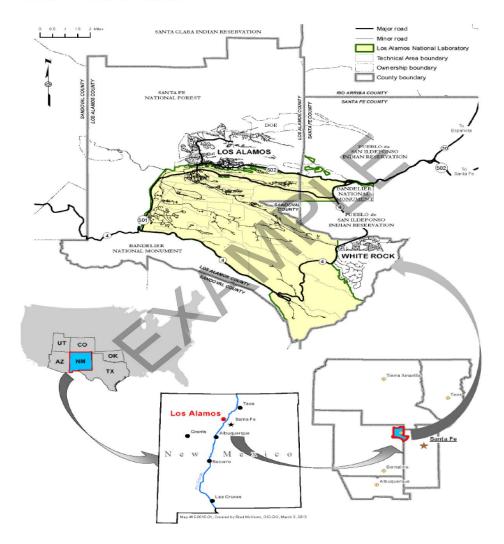
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Maintenance		

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# Attachment 1: EPC-CP-QP-2110 R0 Form 1, MSGP SWPPP Template Example (cont.) (Page 24 of 50)

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### FIGURE A: GENERAL LOCATION MAP



MSGP Stormwater Pollution		
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# Attachment 1: EPC-CP-QP-2110 R0 Form 1, MSGP SWPPP Template Example (cont.) (Page 25 of 50)

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FIGURE B: MAP(S)

Label the figures as Figure B-1, Figure B-2, etc.

Insert maps in the following order:

- Facility specific site map(s),
- Receiving waters maps, and
- Threatened Endangered Species Map.



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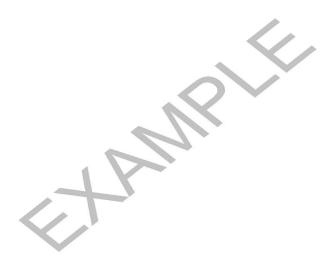
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ATTACHMENT 1: NOTICE OF INTENT, SUPPORTING DOCUMENTATION, AND UPDATES

Insert the appropriate attachment. Note: There may be several "Change NOIs" submitted to EPA within a permit term. Contact the MSGP Program Lead to ensure all are included in this attachment.



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# Attachment 1: EPC-CP-QP-2110 R0 Form 1, MSGP SWPPP Template Example (cont.)

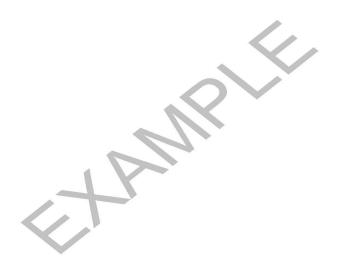
(Page 27 of 50)

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ATTACHMENT 2: SWPPP AMENDMENTS

Insert text documenting all changes or updates made to the SWPPP. Text may be in table format as shown below.

Date	Plan Section	Reason for Amendment	Amendment



MSGP Stormwater Pollution		
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Maintenance		

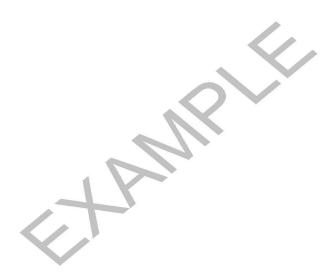
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ATTACHMENT 3: CERTIFICATION OF NO UNAUTHORIZED STORMWATER DISCHARGES

Insert the appropriate attachment.



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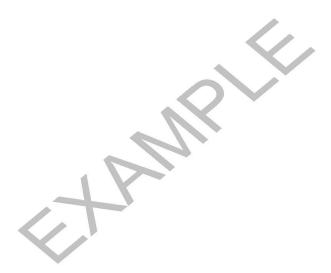
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Attachment 1: EPC-CP-QP-2110 R0 Form 1, MSGP SWPPP Template Example (cont.) (Page 29 of 50)

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ATTACHMENT 4: DULY AUTHORIZED SIGNATORY MEMORANDUM

Insert the appropriate attachment.



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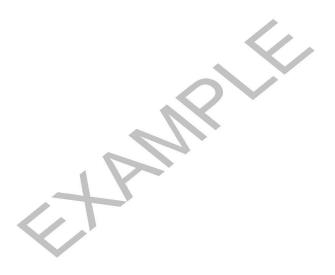
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ATTACHMENT 5: DISCHARGE MONITORING REPORTS

Insert the discharge monitoring reports.



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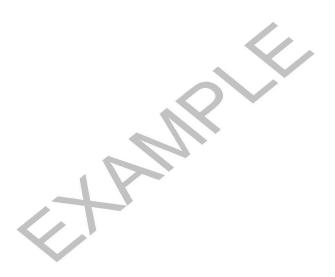
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ATTACHMENT 6: ANNUAL REPORTS

Insert the annual reports. The MSGP Program Lead provides these.



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ATTACHMENT 7: ROUTINE FACILITY INSPECTIONS

Insert completed Routine Facility Inspection forms.



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ATTACHMENT 8: QUARTERLY VISUAL ASSESSMENTS

Insert completed Quarterly Visual Assessment forms. EPC-CP provides these by memorandum as they are produced.



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ATTACHMENT 9: CORRECTIVE ACTION DOCUMENTATION AND CERTIFICATION

Contact the EPC-CP MSGP Program Lead for an excel spreadsheet of all corrective actions and a certification statement for signature.



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ATTACHMENT 10: SCHEDULED MAINTENANCE LOG

### **SCHEDULED MAINTENANCE LOG**

Control Measure or

Equipment Description (include location where appropriate) Action Taken / Comments  Action Taken B (printed name & Z		Familian and Basenindian		Author Talana Dec
Date (include location where appropriate) Action Taken/Comments (printed name & 2		<b>Equipment Description</b>		Action Taken By
	Date	(include location where appropriate)	Action Taken/Comments	(printed name & Z no.)
		1		

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ATTACHMENT 11: TRAINING DOCUMENTATION

Insert the appropriate documentation.



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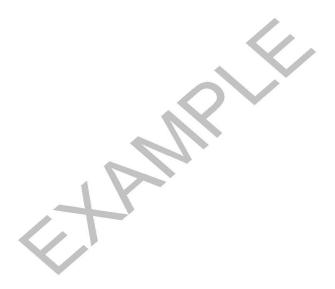
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ATTACHMENT 12: MSGP (OR ACTIVE URL)

Either insert a copy of the most current Permit, or insert the URL address (see example below).

A copy of the 2015 MSGP is kept on file with the SWPPP in hard copy.

The active URL for the permit is https://www.epa.gov/npdes/final-2015-msgp-documents



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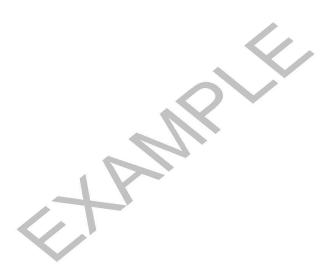
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ATTACHMENT 13: THREATENED AND ENDANGERED SPECIES HABITAT MANAGEMENT PLAN FOR

LOS ALAMOS NATIONAL LABORATORY

Insert the most current revision of the management plan for LANL.



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ATTACHMENT 14: MSGP IPAC TRUST RESOURCES REPORT

Contact the EPC-CP MSGP Program Lead for this information formatted for insertion.

NOTE: The Permit requires this information. However, LANL EPC-ES has completed consultation with U.S. Fish and Wildlife Service. Letters of Consultation are contained in the NOI (see Attachment 1). Refer to Attachment 13 for the species habitat management plan.



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ATTACHMENT 15: EPC-CP-PIP-2101, NPDES MULTI-SECTOR GENERAL PERMIT

Insert the appropriate plan into this SWPPP. Ensure the most current revision of this plan is inserted.



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ATTACHMENT 16: EPC-CP-QP-023, MSGP ROUTINE FACILITY INSPECTIONS

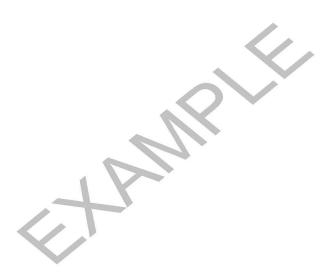


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ATTACHMENT 17: EPC-CP-QP-022, MSGP CORRECTIVE ACTIONS



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ATTACHMENT 18: EPC-CP-QP-064, MSGP STORMWATER VISUAL ASSESSMENTS



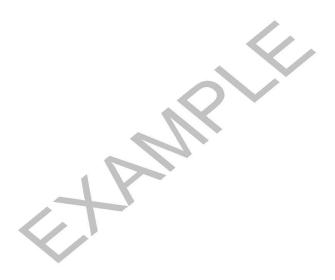
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ATTACHMENT 19: EPC-CP-QP-<mark>047</mark>, INSPECTING STORMWATER RUNOFF SAMPLERS AND RETRIEVING SAMPLES FOR THE MSGP



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ATTACHMENT 20: EPC-CP-QP-2106, PROCESSING MSGP STORMWATER SAMPLES



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ATTACHMENT 21: EPC-DO-QP-101, ENVIRONMENTAL REPORTING REQUIREMENTS FOR RELEASES

OR EVENTS



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ATTACHMENT 22: EPC-CP-QP-007, SPILL INVESTIGATIONS



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ATTACHMENT 23: EPC-CP-QP-2110, MSGP STORMWATER POLLUTION PREVENTION PLAN

PREPARATION AND MAINTENANCE



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ATTACHMENT 24: LOCAL PROCEDURE

Insert the appropriate procedure or parts of the procedure that pertain to this SWPPP. If this section is used, ensure the most current revision of the attached procedure is inserted. Delete section if not needed.



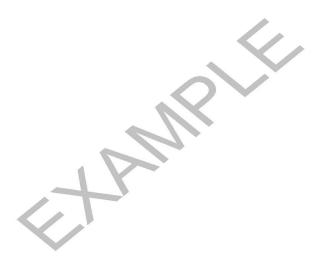
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ATTACHMENT 25: LOCAL PROCEDURE

Insert the appropriate procedure or parts of the procedure that pertain to this SWPPP. If this section is used, ensure the most current revision of the attached procedure is inserted. Delete section if not needed.



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### Attachment 2: MSGP SWPPP Review Guidance Checklist Example

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REQUIREMENT	ON/Sak	NOTES
Stormwater Pollution Prevention Team		
Is the SWPPP being developed or updated by a qualified person?		
Does the SWPPP list Stormwater Pollution Prevention Team members (by name or title) and each		
individual's responsibilities?		
Is a copy of the SWPPP immediately available at the site and on-line?		
If the SWPPP refers to procedures or other documents, are copies of the relevant portions of these		
procedures or documents present in the SWPPP?		
Site Description		
Does the SWPPP include the following information?		
<ul> <li>Identify a description of the nature of the industrial activities at the site</li> </ul>		
Provide a general location map (e.g., U.S. Geological Survey (USGS) quadrangle map) with enough		
detail to identify the location of the site and all receiving waters for industrial stormwater discharges.		
Site map showing the following:		
Boundaries of the property and size of the property in acres		
Location and extent of significant structures and impervious surfaces		
Direction(s) of stormwater flow (using arrows)		
Locations of all stormwater control measures		
• Locations of all receiving waters, including wetlands, in the immediate vicinity of the site. Indicate		
which water bodies are listed as impaired and which are identified as Tier 2, Tier 2.5, or Tier 3		
waters (for LANL, none)		
<ul> <li>Locations of all stormwater conveyances including ditches, pipes, and swales</li> </ul>		
• Locations of potential pollutant sources associated with each industrial activity (see Part 5.2.3.2)		
Incations where simifficant saille or leaks have positived (see Part 5.7.3.2)		
Location(s) of all stormwater monitoring points		
• Location of each stormwater inlet and outfall, with a unique identification code for each outfall (i.e.,		
001, 002, 003, etc.), indicating if you are treating one or more outfalls as "substantially identical"		
(See I also Siero, Siero o, and Orene)		
NOTE: Although LANL does not currently have an MS4, EPA has published a draft permit.		
<ul> <li>Areas of designated critical habitat for endangered or threatened species</li> </ul>		
<ul> <li>Locations of the following activities where such activities are exposed to precipitation:</li> </ul>		

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## MSGP SWPPP Review Guidance Checklist

SWPPP Title

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MSGP SWPPP Review Guidance Checklist

### Attachment 2: MSGP SWPPP Review Guidance Checklist Example (cont.)

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### date the SWPPP was prepared or amended? discharges and the corresponding outfall(s) that would be affected by such spills and leaks identified in Are all pollutants or pollutant constituents (e.g., zinc, sulfuric acid, cleaning solvents, motor oil, diesel unloading, transportation, disposal or conveyance of any raw material, intermediate product, final Are areas described in the SWPPP where industrial material or activities are exposed to stormwater or done and does it include the following information? Has an evaluation for the presence of unauthorized non-stormwater discharges (see Part 1.1.3) been occurred at exposed areas, or that drained to a stormwater conveyance, in the three years prior to the Are all significant spills and leaks of oil or toxic or hazardous substances identified that actually Are areas where **potential** spills and leaks could occur that could contribute pollutants to stormwater prepared or amended. disposed and that have been exposed to stormwater in the three years prior to the date the SWPPP is NOTE 2: The list must include all pollutants/materials that have been handled, treated, stored, or gasoline, brake fluid, etc.) associated with each activity identified? product or waste product. final products, and waste products. Material handling activities include the storage, loading and machinery; raw material; industrial production and processes; and intermediate products; by-products; NOTE 1: Industrial material or activities include material handling equipment or activities; industrial from which allowable non-stormwater discharges originate? A list of the outfall or onsite drainages points that were directly observed during the evaluation the SWPPP? A description of the evaluation criteria used Date of the evaluation Vehicle and equipment maintenance and/or cleaning area quantities of pollutants Locations and sources of run-on to the site from adjacent property that contains significant Transfer areas for substances in bulk material, or by-products used or created by the site Immediate access roads used by carriers of raw materials, manufactured products, waste Processing and storage areas Locations used for the treatment, storage, or disposal of wastes Fueling station(s) Liquid storage tanks Loading/unloading areas YES/NO NOTES

Are the selection and design considerations for control measures to meet the following non-numeric

Does the SWPPP indicate how the control measure addresses the potential pollutant sources?

instances to minimize the discharge of pollutants.

Using treatment interceptors (e.g., swirl separators and sand filters) may be appropriate in some

Conserving and/or restoring riparian buffers will help protect streams from stormwater runoff and

improve water quality

impacts of erosive flows

Attenuating flow using open vegetated swales and natural depressions can reduce in-stream

taken to avoid ground water contamination

technology-based effluent limits (see Part 2.1.2) identified in the SWPPP?

Minimize Exposure: All manufacturing, processing and material storage areas (including loading and

unloading, storage, disposal, cleaning, maintenance, and fueling operations) must have controls that minimize exposure to pollutant discharges by either locating these industrial materials and activities

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Does the SWPPP indicate whether the following control measure selection and design criteria were

Preventing stormwater from coming into contact with polluting materials is generally more

effective, and less costly, than trying to remove pollutants from stormwater

### Attachment 2: MSGP SWPPP Review Guidance Checklist Example (cont.)

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Minimizing impervious areas at the facility and infiltrating runoff onsite (including bio-retention

cells, green roofs, and impervious pavement, among other approaches) can reduce runoff and

improve ground water recharge and stream base flows in local streams, although care must be

Assessing the type and quantity of pollutants, including their potential to impact receiving water

isolation for minimizing pollutants in stormwater discharge

quality, is critical to designing effective control measures that will achieve the limits in this permit

Using control measures in combination which may be more effective than using control measures in

### Is all stormwater discharge sampling data collected at the site during the precious permit term summarized in a narrative description? This may include data tables and figures industrial purposes: is there documentation of the location of any salt storage piles used for deicing or other commercial The action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s) application was submitted for an unauthorized cooling water discharge. or documentation that a floor drain was sealed, re-routed to sanitary, or an NPDES permit YES/NO

MSGP SWPPP Review Guidance Checklist

# Use grading, berming or curbing to prevent runoff of contaminated flows and divert run-on away

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MSGP SWPPP Review Guidance Checklist

### Attachment 2: MSGP SWPPP Review Guidance Checklist Example (cont.)

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### Is there language in the SWPPP indicating in instances where control measures need repair or Does the SWPPP contain language indicating immediate action must be taken to minimize pollutant Perform inspections and preventive maintenance of stormwater drainage, source controls, treatment replacement that the facility (or associated representatives thereof) must immediately take all discharges if control measures need routine maintenance? systems, and plant equipment and systems that could fail and result in contamination of stormwater You may include extra information, or you may just "cut-and-paste" the effluent limits verbatim into the SWPPP w/out Good housekeeping (all areas where potential pollutants are exposed to stormwater must be kept Maintenance (All industrial equipment, systems and control measures must be maintained in effective operating condition in order to minimize pollutant discharges) and immediately removing any accumulated dust at the base of the exterior baghouse.\* Inspect and maintain baghouses at least quarterly to prevent the escape of dust from the system Diligently maintain non-structural control measures (e.g., keep spill response supplies available, Store materials in appropriate containers. Sweep or vacuum at regular intervals or wash down the area and collect and/or treat and properly Drain fluids from equipment and vehicles that will be decommissioned, and, for any equipment Perform all vehicle and/or equipment cleaning operations indoors, under cover, or in bermed Use spill overflow protection equipment; Store leaky vehicles and equipment indoors or, if stored outdoors, use drip pans and absorbents, Locate materials, equipment, and activities so that potential leaks and spills are contained or able Cleaning catch basins when the depth of debris reached two thirds (2/3) of the sump depth and and personnel appropriately trained) exposed areas free of such materials Minimize the potential for waste, garbage, and floatable debris to be discharged by keeping of the permit does not authorize dry weather discharges from dumpsters or roll off boxes.\* lids and could leak, ensure that discharges have a control (e.g., secondary containment). Part 1.1.3 Keep all dumpster lids closed when not in use. For dumpsters and roll off boxes that do not have dispose of the wash down water. areas that prevent runoff and run-on and also that capture any overspray; and of pollutants; Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge to be contained or diverted before discharge; and vehicles that will remain unused for extended periods of time, inspect at least monthly keeping the debris surface at least six inches below the lowest outlet pipe.\*

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### Attachment 2: MSGP SWPPP Review Guidance Checklist Example (cont.)

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### MSGP SWPPP Review Guidance Checklist

REQUIREMENT	YES/NO NOTES	ES
reasonable steps (see Part 4.3.1 for definition) to prevent or minimize the discharge of pollutants until	_	
that the material will not be discharged during subsequent storm events. Final repairs/replacement of		
stormwater controls should be completed as soon as feasible but must be no later than the		
timeframes established in Part 4.3 for corrective actions, i.e., within 14 days or, if that is infeasible,		
within 45 days.		
Is there language in the SWPPP indicating corrective action must be taken (in accordance with Part 4.0)		
If a control measure was never installed, was installed incorrectly or not in accordance with Parts 2 and/or 8 or isn't being properly operated or maintained?		
• Spill Prevention and Response - The potential for leaks, spills, and other release must be minimized	•	
by the development of plans for effective response to such spills if or when they occur in order to		
minimize pollutant discharges.		
- Plainly label containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides") that could		
be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if		
- Implement procedures for material storage and handling including use of secondary containment		
and barriers between material storage and traffic areas.		
<ul> <li>Develop training on the procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases as soon as possible.</li> </ul>		
- Keep spill kits on-site, located near areas where spills may occur or where a rapid response can be		
made		
- Notify appropriate facility personnel when a leak, spill, or other release occurs. Where a leak, spill or other release containing a hazardous substance or oil in an amount equal to or in excess of a		
reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, or 40 CFR part 302,		
occurs during a 24-hour period, you must notify the National Response Center (NRC) at (800) 424-		
8802 in accordance with the above referenced requirements as soon as you have knowledge of		
the discharge.		
readily accessible and available?		
Erosion and Sediment Controls		
- Does the SWPPP identify how exposed soils will be stabilized to minimize pollutant discharges?		
- Does the SWPPP identify flow velocity dissipation devices placed at discharge locations to		
minimize channel and streambank erosion and scour in the immediate vicinity of discharge		
- Does the SWPPP identify structural and non-structural control measure to minimize the discharge		
	_	

Are the following employees identified as requiring training?

the MSGP Corrective Action Reporting database) identified?

notification procedures?

Are procedures included in the SWPPP for preventing and responding to spills and leaks, including

Is there a schedule or frequency for maintaining all control measures?

Are backup practices in place should a runoff event occur while a control measure is off line?

spills, and other releases?

repair) for all control measures included in the SWPPP to avoid situations that may result in leaks, Are preventative maintenance procedures (including regular inspections, testing, maintenance and Does the SWPPP contain a schedule or convention used for determining when pickup or disposal of

waste materials occurs?

Section 9.6.2.1 identified in the SWPPP?

Schedules and Procedures - Control Measures

Are the benchmark values (i.e., the Lowest New Mexico Water Quality Standard) listed in MSGF

Are clean-up equipment, procedures and spill logs (i.e., reportable and non-reportable spill reports and

Are control measures for material handling and storage identified?

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### Attachment 2: MSGP SWPPP Review Guidance Checklist Example (cont.)

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### Are effluent limitations identified for the Sector A facility (Timber Products) (see Part 8.A.7)? Are effluent limitations identified for the Sector D facility (Asphalt Paving) (see Part 8.D.4)? Control Measures to Meet Water Quality Based Effluent Limits (see Part 2.2 and Part 9.6.2) Control Measures to Meet Numeric Effluent Limitations Guidelines-Based Limits (see Part 2.1.3 and Part 8) Salt Storage Piles or Piles Containing Salt - Does the SWPPP reused, contained, or otherwise reduced to minimize polluta Management of Runoff - Does the SWPPP identify how stor minimize pollutant discharges?) If polymers and/or other chemical treatments are used for SWPPP must identify the polymers and/or chemicals used

### Non-Sto Dust Ge materials from the salt pile?

## generation and off-site tracking of raw, final, or waste materials must be minimized in order to

allowing discretized the control of
and eliminate the discharge?)
and eliminate the discharger)

and off cita	eration and \	d eliminate ti
and off site tracking of raw final or waste mai	ration and Vehicle Tracking of Industrial Mater	d eliminate the discharge?)
final ,	of Indu	
מיחבלה א	ıstrial Mat	
2	e	

ter Discharges - Does the SWPPP indicate that personnel will evaluate the site for er discharges not explicitly authorized in Part 1.1.3 or covered by another NPDES minate the discharge?)
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	resulting from adding to or removing
	o solo
	identify how salt piles are enclosed or
	ants in the discharge?
	mwater runoff is diverted, infiltrated,
	and the purpose?
	ו ממצר בטוונוטו טו צנפטווולפנוטוו, מסבצ נווכ

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### Is the facility claiming an exception as an inactive and unstaffed site? If yes, the facility must include SWPPP identify the person (s) or positions of person(s) responsible for the inspection? Is the procedure identified for conducting routine facility inspections? Are locations where samples are collected, including any determination that two or more outfalls are or activities exposed to precipitation at the site and the NOI must be modified and re-certified That is, the SWPPP must contain a signed certification indicating that there are no industrial materials information in the SWPPP that supports this claim as required by Parts 3.1.1, 3.2.3, 6.2.1.3 and 6.2.4.2 Are specific items to be covered by the inspection, including schedules for specific outfalls identified in irregular stormwater runoff discharges (see Part 3.2.3)? Is the procedure identified for conducting visual assessments? Are parameters for sampling and the frequency of sampling for each parameter listed? limitations guidelines and impaired waters monitoring? Does the SWPPP contain documentation of procedures used to conduct benchmark, effluent Does the SWPPP contain an alternative schedule for conducting visual assessments in climates with For each type of inspection performed (i.e., routine inspection and visual assessments) does the Schedules and Procedures - Inspections and Assessments Are records of completed training kept in the SWPPP? Are the following elements of the training plan documented in the SWPPP? • The location of all controls on the site required by this permit and how they are to be maintained Spill response procedures, good housekeeping, maintenance requirements, and material Are the following identified as elements of required training? Personnel who are responsible for taking and documenting corrective actions. Frequency/schedule of training Content of the training An overview of what is in the SWPPP When and how to conduct inspections, record applicable findings, and take corrective actions The proper procedures to follow with respect to the permit's pollution prevention requirements Personnel who are responsible for conducting and documenting monitoring and inspections contaminants in stormwater discharges Personnel responsible for the storage and handling of chemicals and materials that could become Personnel who are responsible for the design, installation, maintenance and/or repair of controls (including pollution prevention measures) NOTES

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MSGP SWPPP Review Guidance Checklist

### Attachment 2: MSGP SWPPP Review Guidance Checklist Example (cont.)

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### Does the SWPPP contain the following up-to-date and complete inspection, monitoring, and Is there language indicating quarterly visual assessments of substantially identical outfalls will be Does the SWPPP contain the following relative to SIOs? Are numeric control values (benchmark, effluent limitations guidelines, water quality standards) monitoring periods for climates with irregular stormwater runoff (see Part 6.1.6)? Does the SWPPP contain schedules for monitoring at the facility, including a schedule for alternate Corrective Action Documentation - If an event triggering corrective action is associated with an SIO, did Is there language indicating quarterly visual assessment of the discharge at one SIO will also apply to Do Substantially Identical Outfalls identified on the SWPPP map match those identified in MDMRe? Does the SWPPP list procedures for gathering storm event data (see Part 6.1)? Copy of the acknowledgement you receive from the EPA assigning your NPDES ID. Copy of NOI submitted to EPA along with any correspondence exchanged between the facility and the review of the need for action encompass all related substantially identical outfalls? the other SIOs? performed on a rotating basis throughout the permit term? applicable to discharges from each outfall identified? certification records? Justification as to why the outfalls are expected to discharge substantially identical effluents Location of each of the substantially identical outfalls hedules and Procedures - Substantially Identical Outfalls (SIOs Documentation of maintenance and repairs of control measures, including the date(s) of regular Copy of the MSGP Permit (an electronic copy easily available to SWPPP personnel is also An estimate of the runoff coefficient of the drainage areas (low = under 40%, medium = 40% to 65% Description of the exposed material located in the drainage area of each outfall that are likely to be Description of the control measures implemented in the drainage area of each outfall Description of the general industrial activities conducted in the drainage area of each outfall All inspection reports, including the Routine Facility Inspection Reports (see Part 3.1.2) and maintenance/repair schedules (See Part 2.1.2.3). that the control measure(s) returned to full function, and the justification for any extended maintenance, date(s) of discovery of areas in need of repair/replacement, and for repairs, date(s) EPA specific to coverage under this permit high = above 65% significant contributors of pollutants to stormwater discharges Quarterly Visual Assessment Reports (see Part 3.2.2) YES/NO NOTES

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none were needed under the following circumstances?

Has the SWPPP been reviewed and does documentation exist as to the modifications made or why

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### SWPPP been updated within 14 calendar days of completing the corrective action (see Part 4.4)? Where a corrective action triggers a change in any of the control measures or procedures, has the Is the Annual Report signed by a duly authorized representative (per Part B.11)? Are SWPPP modifications signed and dated by a duly authorized representative? Is the SWPPP signed and dated by a duly authorized representative (per Part B.11)? Corrective action documentation (see Part 4.4) Support for claim that facility has changed its status from active to inactive and is unstaffed with All Discharge Monitoring Reports and Annual Reports criteria for historic property preservation (Criterion A, B, C or D) (see Part 1.1.4.6). Documentation supporting the determination that stormwater discharges, allowable non-Documentation supporting that stormwater discharges, allowable non-stormwater discharges, and sources. (see Part 6.2.4.1) Documentation of any benchmark exceedances and the type of response to the exceedance reason for the deviations (e.g., adverse weather or it was impracticable to collect samples within the Description of any deviations from the schedule for visual assessments and/or monitoring, and the benchmark monitoring, and/or impaired waters monitoring. respect to the requirements to conduct routine facility inspections, quarterly visual assessments stormwater discharges, and stormwater discharge-related activities meet one of the eligibility that is designated as "critical habitat" under the Endangered Species Act (see Part 1.1.4.5). stormwater discharge-related activities are not likely to adversely affect any species that are pollutants were not detected in your discharge or were solely attributable to natural background present above natural background levels if you discharge directly to impaired waters and that such Documentation to support any determination that pollutants of concern are not expected to be employed including the following: first 30 minutes of a measurable storm event) (see Parts 3.2.3 and 6.1.5) federally listed as endangered or threatened ("listed") and are not likely to adversely affect habitat A finding that the exceedance was due to natural background pollutant levels; A finding that no further pollutant reductions were technologically available and economically A determination from EPA that benchmark monitoring can be discontinued because the practicable and achievable in light of best industry practice consistent with Part 6.2.1.2 exceedance was due to run-on; OR The corrective action taken; YES/NO NOTES

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REQUIREMENT  Page 17  REQUIREMENT  REQUIREMENT  Page 17  Page 18  Page 18	
<ul> <li>An unauthorized release or discharge (e.g., spill leak, or discharge of non-stormwater not authorized by this or another NPDES permit to a water of the U.S.) occurs at your facility.</li> <li>A discharge violates a numeric effluent limit listed in Table 2-1 and in the sector specific requirements.</li> <li>The control measures are not stringent enough for the discharge to meet applicable water quality</li> </ul>	NOTES
<ul> <li>A discharge violates a numeric effluent limit listed in Table 2-1 and in the sector specific requirements.</li> <li>The control measures are not stringent enough for the discharge to meet applicable water quality</li> </ul>	
<ul> <li>The control measures are not stringent enough for the discharge to meet applicable water quality</li> </ul>	
standards or the non-numeric effluent limits in this permit.	
<ul> <li>A required control measure was never installed, was installed incorrectly, or not in accordance with Parts 2 and/or 8, or is not being properly operated or maintained.</li> </ul>	
<ul> <li>Whenever a visual assessment shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam).</li> </ul>	
<ul> <li>Construction or a change in design, operation, or maintenance at your facility that significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged.</li> </ul>	
<ul> <li>The average of four quarterly sampling results exceeds an applicable benchmark (see Part 6.2.1.2). If less than four benchmark samples have been taken, but the results are such that an exceedance of the four quarter average is mathematically certain (i.e., the sum of quarterly sample results to date is more than four times the benchmark level) this is considered a benchmark exceedance.</li> </ul>	
Public Accessibility of SWPPP	
Is your SWPPP uploaded to the UKL provided in the NOI?  Are subsequent SWPPP modifications (updates), records and all other reporting elements required for the previous year updated no later than 45 days after conducting the final routine facility inspection.	
for the year?  If you did not upload your SWPPPs to a URL, was the following information provided in the NOI and documented in the SWPPP?	
• Onsite industrial activities exposed to stormwater, including potential spill and leak areas (see Parts 5.,2.3.1, 5.2.3.3 and 5.2.3.5);	
<ul> <li>Pollutants or pollutant constituents associated with each industrial activity exposed to stormwater that could be discharged in stormwater and/or any authorized non-stormwater discharges listed in Part 1.1.3 (see Part 5.2.3.2)</li> </ul>	
• Stormwater control measures employed to comply with the non-numeric technology-based effluent limits required in Part 2.1.2 and Part 8, and any other measures taken to comply with the requirements in Part 2.2, Water Quality Based Effluent Limitations. If polymers and/or other chemical treatments are used as controls, these must be identified and the purpose explained.	
<ul> <li>The schedule for good housekeeping, maintenance, and schedule for all inspections required in Part</li> <li>3.</li> </ul>	

MSGP Stormwater Pollution
<b>Prevention Plan Preparation and</b>
Maintenance

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In the case of leaks and spills, were response actions, date/time of clean up, notification, etc.	Was immediate action taken to minimize or prevent the discharge of pollutants?	Is the date the corrective action was identified captured?	Is the condition triggering the need for the corrective action identified?	Are corrective actions documented within 24 nours of becoming aware of such conditions	Are corrections actions documented within 21 hours of becoming aware of such condition?	Corrective Actions	NOI" form no later than 45 days after conducting the final routine facility inspection for the year?	Are modifications to the SWPPP information required in the four bullets above submitted on a "Change	REQUIREMENT	
									YES/NO	
									NOTES	
	In the case of leaks and spills, were response actions, date/time of clean up, notification, etc.	Was immediate action taken to minimize or prevent the discharge of pollutants?  In the case of leaks and spills, were response actions, date/time of clean up, notification, etc.	Is the date the corrective action was identified captured?  Was immediate action taken to minimize or prevent the discharge of pollutants?  In the case of leaks and spills, were response actions, date/time of clean up, notification, etc.	Is the conductor triggering the need for the corrective action identified captured?  Is the date the corrective action was identified captured?  Was immediate action taken to minimize or prevent the discharge of pollutants?  In the case of leaks and spills, were response actions, date/time of clean up, notification, etc.	Is the condition triggering the need for the corrective action identified?  Is the date the corrective action was identified captured?  Was immediate action taken to minimize or prevent the discharge of pollutants?  In the case of leaks and spills, were response actions, date/time of clean up, notification, etc.	Are corrective actions documented within 24 hours of becoming aware of such condition?  Is the condition triggering the need for the corrective action identified?  Is the date the corrective action was identified captured?  Was immediate action taken to minimize or prevent the discharge of pollutants?  In the case of leaks and spills, were response actions, date/time of clean up, notification, etc.	Corrective Actions  Are corrective actions documented within 24 hours of becoming aware of such condition?  Is the condition triggering the need for the corrective action identified?  Is the date the corrective action was identified captured?  Was immediate action taken to minimize or prevent the discharge of pollutants?  In the case of leaks and spills, were response actions, date/time of clean up, notification, etc.	NOI" form no later than 45 days after conducting the final routine facility inspection for the year?  Corrective Actions  Are corrective actions documented within 24 hours of becoming aware of such condition?  Is the condition triggering the need for the corrective action identified?  Is the date the corrective action was identified captured?  Was immediate action taken to minimize or prevent the discharge of pollutants?  In the case of leaks and spills, were response actions, date/time of clean up, notification, etc.	Are modifications to the SWPPP information required in the four bullets above submitted on a "Change NOI" form no later than 45 days after conducting the final routine facility inspection for the year?  Corrective Actions  Are corrective actions documented within 24 hours of becoming aware of such condition?  Is the condition triggering the need for the corrective action identified?  Is the date the corrective action was identified captured?  Was immediate action taken to minimize or prevent the discharge of pollutants?  In the case of leaks and spills, were response actions, date/time of clean up, notification, etc.	YES/NO

MSGP SWPPP Review Guidance Checklist