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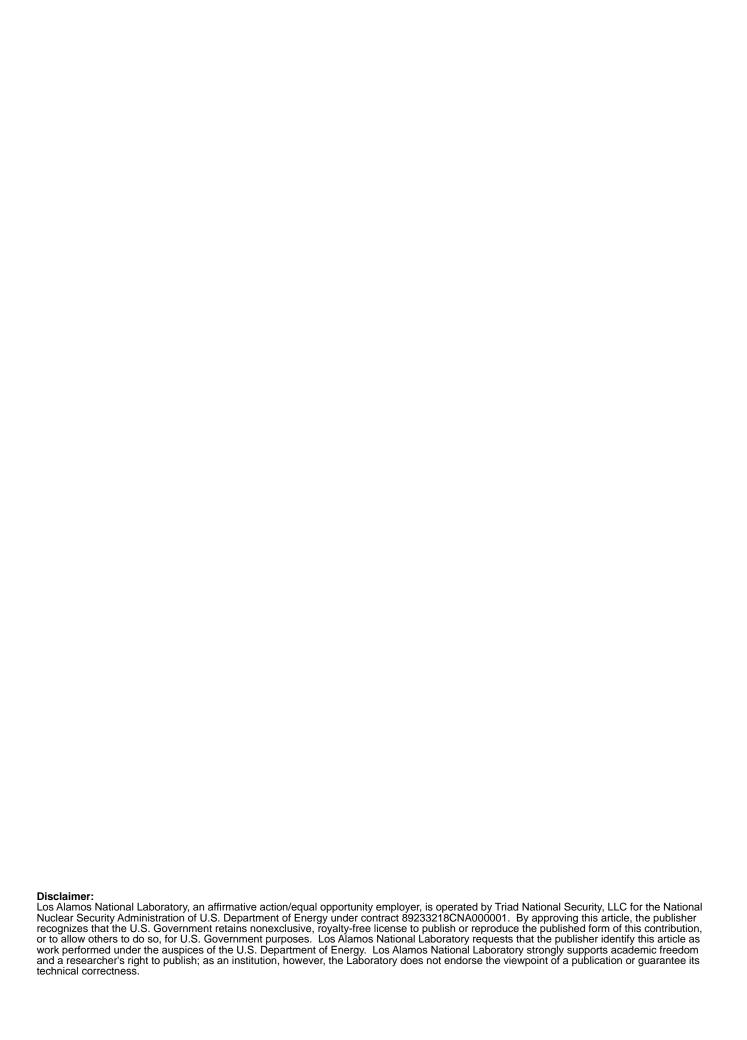
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TA-60 Material Recycling Facility MSGP Stormwater Pollution Prevention Plan UI-PLAN-PPP-005-R2 Revision 2, January 2021

# MSGP Stormwater Pollution Prevention Plan

# **TA-60 Material Recycling Facility**

Triad National Security, LLC Los Alamos National Laboratory

January 2021

**Revision 2** 

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# TA-60 Material Recycling 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, and using the industry specific permit requirements for Sector N: Scrap Recycling and Waste Recycling Facilities 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-60 Material Recycling Facility 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-60 Material Recycling Facility. The current MSGP expires at midnight on June 4, 2020.

#### 1.0 FACILITY DESCRIPTION

#### 1.1 Facility Information

<u> </u>							
Name of Facility: TA-60 Material Recycling Facility							
Street:							
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): Sector N							
Estimated area of industrial activity at site exposed to st	cormwater: 1.8 a	cres					
Discharge Information							
Name(s) of surface water(s)/segment that receives stormwater from your facility: Sandia Canyon from NPDES Outfall 029.							

Does this facility discharge industrial stormwater directly into any segment of an "impaired water" (see definition in 2015 MSGP, Appendix A)? ⊠Yes No								
Pollutants causing the impairment: Total Recoverable Aluminum, Dissolved Copper, PCB (Aroclors), and Temperature								
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)? □Yes ⊠No								
If Yes, which guidelines apply? Not applicable.								

# 1.2 Stormwater Pollution Prevention Team (PPT)

The TA-60 MRF is part of the Utilities and Institutional (UI-DO) Facilities Facility Operations Director at Los Alamos National Laboratory with day to day management provided by Logistics Division-Heavy Equipment Roads & Grounds (LOG-HERG), which has established a PPT whose members are responsible for assisting the facility manager in developing and revising the facility's SWPPP as well as maintaining control measures and taking corrective actions when required. All PPT members will have access to either a hard copy or an electronic version of this SWPPP.

The specific duties of individual team members of the PPT are listed in the following table:

Staff Names	Individual Responsibilities
Deployed Environmental Professionals (DEPs): Leonard Sandoval, EPC-CP	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.

Staff Names	Individual Responsibilities
Facility Operations Division (FOD) Manager: Lawrence Chavez, Operations Manager, UI-DO	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 FOD propose new processes, operations, features, or a new site that may be subject to the MSGP.
EPC Core: Holly Wheeler, MSGP Team Lead, EPC-CP	The MSGP Program Lead is responsible for managing and administering the MSGP Program for all industrial facilities operated by Triad within Los Alamos National Laboratory. The 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):  Danny Esquibel, Maintenance  Manager (LOG-HERG)	Responsible for day-to-day operations at the facility. Assists the DEP and EPC with inspections; spill reporting; implementing, installing and maintaining storm water controls (also known as 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

The activities at this site may be classified under Sector N: Scrap Recycling and Waste Recycling Facilities. The primary operation of the TA-60 MRF is for consolidation, staging, and shipment of source separated recyclable materials (metals, paper, cardboard etc.) from LANL to off-site recycling facilities. Dome 60-0085 was historically used to segregate solid waste from recycling materials and potential hazardous waste. However, this activity no longer occurs at the facility. The Dome is currently being used for storage of the paper dumpsters in the west half of the dome and used by Roads & Grounds crews for storage of snow removal four wheelers.

Of the 2-acre MRF site, approximately 90% (1.8-acres) consists of impervious surfaces in the form of rooftops, asphalt, compacted asphalt millings or concrete surfaces. Stormwater flow direction on the site is primarily to the east. Run-on to the site has been diverted into two primary drainage channels as seen on the site map.

A grated trench drain structure was installed directly to the west of the entrance in October 2005. This structure diverts the majority of the stormwater run-on away from the site into a small drainage swale along the south side of the site.

Stormwater runoff flows from west to east across the site and drains into a concrete catch basin in the northeast corner of the facility. The concrete catch basin was constructed during October 2005, and a drain valve was installed at the outlet of the basin. The increased catchment size and drain allows for water captured in the basin to be detained longer and released at a much slower rate than was previously allowed. The increased retention time allows for sediment transported by stormwater to settle out before its release. Also, grated filters were installed in conjunction with the basin. The runoff flows into the basin and eventually through the four filters. The filters provide additional sediment and debris removal. The drain valve is kept in a closed and locked position.

#### **Outfalls**

There is one stormwater outfall associated with this facility:

<u>Outfall 029:</u> Is representative of all stormwater runoff associated with the facility. Stormwater discharges from the facility are to the east into Sandia Canyon (impaired waters), which is a tributary of the Rio Grande located approximately 10 miles east of the facility. Automated monitoring station **MSGP02901** is located at Outfall 029.

## 1.4 General Location Maps

General facility site map of the facility can be found in Figure B-1. The nearby receiving waters map (Figure B-2) shows the locations of all receiving waters associated with stormwater discharges from the facility. 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 Maps

Site maps illustrate the facility's activities: including property boundaries, structures, impervious surfaces, operational areas as well as information on drainage patterns, stormwater and erosion control structures, potential pollutant sources, and nearby receiving streams.

- Site Boundaries and Acreage. The site covers approximately 1.8 acres
- **Significant Structures and Impervious Surfaces.** The site is 90% impervious, primarily rooftops, asphalt, compacted asphalt millings or concrete surfaces.
- **Direction of Stormwater Flow and Site Drainage.** Direction of flow is indicated with arrows.
- Locations of Structural Stormwater Control Measures.

- Locations of all Receiving Waters in the immediate vicinity of the facility, indicating if any of the waters are Impaired and, if so, whether the waters have TMDLs established for them (see paragraph below this list). Maps of nearby receiving waters is provided in Figure B-2.
- 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 029, 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 none in the direct vicinity of the facility. However, a map for threatened and endangered species within LANL property is included in Figure B-3.
- 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:
  - fueling stations (refueling trucks are kept on site);
  - o vehicle and equipment maintenance and/or cleaning areas;
  - loading/unloading areas;
  - o locations used for the treatment, storage, or disposal of wastes;
  - liquid storage tanks;
  - processing and storage areas;
  - immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility;
  - transfer areas for substances in bulk;
  - o machinery; and
  - location and sources of run-on to the site.

#### 2.0 POTENTIAL POLLUTANT SOURCES

Industrial activities that could potentially result in releases to the environment are summarized in 2.1. The site map for the facility is provided in Figure B-1.

# 2.1 Potential Pollutants Associated with Industrial Activity

Industrial Activity	Associated Pollutants
Recycling material staging and storage	Metal contaminated water, paper debris, and liquid draining from soda cans
Recycling container/roll-off handling and transport	Motor and transmission oils, antifreeze, fuels, grease, battery acid

# 2.2 Spills and Leaks

#### **Past Spills and Leaks**

Spills and leaks for the past 3 years (2018-2020) are summarized in Attachment 24. Spills and leaks that occurred prior to 2018 are documented in previous SWPPP revisions.

# Areas on Site Where Spills/Leaks Could Occur

Location	Discharge Points
Recyclable metals roll-off bin staging and loading/unloading area at the far east end of the facility	Single ENV-CP monitoring outfall 60-MRF-1 ID# 029 east of MRF fence-gage station E122.35
Transformer 60-0188 located SE of covered Dome 60-0085 with 205 gallons of Non- PCB mineral oil and covered under an existing SPCC Plan	Single ENV-CP monitoring outfall 60-MRF-1 ID# 029 east of MRF fence-gage station E122.35

In the event of a 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. As this facility regularly repairs heavy equipment and vehicles, spill protection is 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 will 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

Non-storm water discharges are also identified in the "Non-Storm water Discharge Assessment and Certification" that is located in Attachment 3. This certification form certifies that all storm water outfalls have been evaluated for the presence of non-storm water discharges. This form will be updated whenever a change in possible non storm water discharges is determined.

# 2.4 Salt Storage

No salt storage piles used for de-icing or other commercial or industrial purposes are located at the TA-60 Material Recycling Facility.

# 2.5 Historical Data Summary

# **Permitted Facility: TA-60 Materials Recycling Facility**

## Calendar Year 2019

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.
029	N/A¹	Total Aroclor,	N/A	N/A	N/A	Al	Cu

<sup>&</sup>lt;sup>1</sup>N/A – No quarterly benchmark monitoring required.

# Calendar Year 2020

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.	
029	N/A <sup>1</sup>	_	N/A	N/A	N/A	Al	Cu	

<sup>&</sup>lt;sup>1</sup>N/A – No quarterly benchmark monitoring required.

#### 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.

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

#### 3.1.1 Minimize Exposure

To minimize exposure of industrial activities to precipitation events, the MRF utilizes covers for recyclable material containers and roll-off bins that are typically stored at the east end of the site. Metal canopies located in the central portion of the site (north and south side), and a fabric tension dome on the west end of the site are utilized to store recyclable materials, small amounts of waste, and protect equipment during inclement weather.

## 3.1.2 Good Housekeeping

Good housekeeping practices specifically applicable to the prevention of stormwater contamination include the following measures:

Operations personnel at the MRF perform weekly inspections/rounds at the facility which are focused toward keeping the site clean, spill prevention and detection, and identification of potential compliance issues. If a spill is witnessed it is remediated in accordance with this procedure and notifications are made in accordance with P 322-3 "Manual for Communicating, Investigating, and Reporting Abnormal Events". Per Part 2.1.2.2 of the 2015 MSGP, the following actions need to be implemented to ensure good housekeeping:

- Store material in appropriate containers;
- Keep all dumpster lids closed when not in use. For dumpster and roll off boxes that do not have lids and could leak, ensure that discharges have a control (e.g., secondary containment). Consistent with Part 1.1.3 above, this permit does not authorize dry weather discharges from dumpsters or roll off boxes.
- Minimize the potential for waste, garbage and floatable debris to be discharged by keeping exposed areas free of such materials, or by intercepting them before they are discharged.

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 corrective action has been completed. CAR information, along with documentation of maintenance/repair of control measures, is in Attachment 9 of the SWPPP.

Note: "All reasonable steps" means that the permittee has undertaken initial actions to assess and address the condition causing the corrective action, including for example, cleaning up any exposed material that may be discharged in a storm event (e.g., through sweeping, vacuuming) or making arrangement (i.e., scheduling) for a new best management practice to be installed at a later date. If a control measure was never installed, was installed incorrectly or not in accordance with Part 2 and/or 8 of the 2015 MSGP, or is not being properly operated or maintained site personnel must conduct corrective action as specified in Part 4 of the 2015 MSGP.

The retention pond is cleaned at the end of every March prior to the beginning of the new sampling season in April or when the depth of sediment or debris reached two-thirds (2/3) of the depth of the pond and when and if debris is at least six inches from the outlet pipe. According to the manufacturing specifications the functional longevity of the floc logs is 6 months to a year and at the MRF they will be replaced as soon as they deteriorate to the point where they no longer function properly. According to the manufacturing specifications the functional longevity for the Enviro-soxx with Metal-Loxx wattles is also 6 months to a year. At the material recycling facility every March prior to the beginning of the new sampling season in April and every 3 months after in June and September the Metal-Loxx wattles are replaced.

#### 3.1.4 Spill Prevention and Response

Spills, leaks, or other releases will be prevented and minimized by the application of good housekeeping procedures and regular visual inspections.

In general, the approach to spill cleanup is to secure the spill area and contact the Operations and Maintenance Coordinator (OMC) and/or the Security and Emergency Operations (SEO) Emergency Management & Response (EM&R) Team (if necessary).

For incidental releases, Micro-Blaze or dry absorbents can be used and the contaminated absorbents disposed of properly.

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.

Additional EPC-CP procedures for spill reporting and response (see Attachments 21 and 22) include:

- ENV-CP-QP-1007, Spill Investigations
- EPC-DO-QP-101, Environmental Reporting Requirements for Releases or Events

#### 3.1.5 Erosion and Sediment Control

At the northeast corner of the TA-60 MRF stormwater flows into a concrete retention pond and through four drop inlets with floc logs before it discharges into a 24 inch CMP culvert onto a concrete flume upstream of the MSGP sampler. The east end of the facility is covered with compacted asphalt millings and at the northeast corner there's a retention pond with a locked drain valve. Along and adjacent to the receiving end of the concrete retention pond there's a section of angular rock and Enviro-soxx with Metal-Loxx wattle. East of the Dome 60-0085 and along the north perimeter fence line there's a small sediment trap made of angular rock. Between covered structures 60-0251 and

60-0217 and adjacent to the perimeter fence line there is a small section of angular rock. There is also an asphalt berm that runs along and adjacent to sections of the north, east, and south perimeter fence lines.

#### 3.1.6 Management of Runoff

At the west entrance to the TA-60 MRF Eco-Blocs and a grated trench drain divert runon from stormwater runoff into a drainage swale along the south boundary of the facility. Run-on from stormwater runoff from the adjacent roadway to the west is also diverted into another drainage swale along the north boundary of the facility. Runoff is also managed by a 24 inch CMP culvert that discharges from the retention pond onto a concrete flume to the MSGP sampler. The concrete retention basin at the northeast corner of the MRF also has a drain valve that is locked. Along and adjacent to the receiving end of the concrete retention pond there's also angular rock and Enviro-soxx with Metal-Loxx wattle. East of Dome 60-0085 and along the north perimeter fence line there's also a small sediment trap made of angular rock. There's also an asphalt berm along and adjacent to sections of the north, east, and south perimeter fence lines.

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

No salt storage piles used for de-icing or other commercial or industrial purposes are located at the TA-60 Material Recycling Facility.

# 3.1.8 Dust Generation and Vehicle Tracking of Industrial Materials

The east end of the MRF facility, which is primarily used for roll-off bin storage, is the only area that is not covered by asphalt, concrete or structures. This area of the facility has asphalt millings to reduce erosion and sediment transport and to facilitate loading and unloading operations. Once loaded, the vehicles must travel across the MRF site (to the West) which is covered in asphalt. Due to the millings and the asphalt lot, there is little potential for either dust generation or tracking of sediment.

# 3.2 MSGP Sector-Specific Non-Numeric Effluent Limits

- Inbound Recycling Material Control: The MRF and LANL utilize the institution's recycling web site
   (<a href="http://int.lanl.gov/environment/p2/recycle/index/shtml">http://int.lanl.gov/environment/p2/recycle/index/shtml</a>) to educate and inform LANL personnel about acceptable recycling items for shipment to the MRF.
   Drivers responsible for pickup of recycled material inspect their shipment prior to transport and will look for non-recyclable items, chemicals or hazardous waste, and bins containing liquids. If these items are present the shipment will be rejected until the generator can remediate the unacceptable condition.
- **Outdoor Storage:** The MRF minimizes exposure of recyclables to precipitation and runoff by storing as many materials as practical under metal canopies or in the tension fabric Dome.
- Indoor Storage: Recyclable materials are stored inside Dome 60-0085 and

- several metal canopies. MRF personnel perform weekly rounds where housekeeping issues are identified and promptly remediated.
- Vehicle and Equipment Maintenance and Refueling: Vehicle/heavy equipment maintenance is provided by LANL's Maintenance and Site Services (MSS) Division at the TA-60 Heavy Equipment Yard and not done at the MRF. Refueling of vehicle/heavy equipment is also not performed at the MRF.

#### 3.2.1 Numeric Effluent Limitations Based on Effluent Limitations Guidelines

The TA-60 Material Recycling Facility is classified under <u>Sector N- Scrap Recycling</u> <u>and Waste Recycling Facilities</u> and does 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. Benchmark monitoring is not required at the facility.

# 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 the TA-60 Material Recycling Facility discharges to Sandia Canyon. Certain stream reaches within Sandia Canyon have been identified as impaired waters by the NMED Surface Water Quality Bureau (SWQB). According to the 2014-2016 State of NM Clean Water Act 303b/305b Integrated Report and Final List of Assessed Surface Waters, pollutants causing the impairment are listed as: *Gross Alpha, Aluminum, PCB (Aroclors), Copper, and Thallium.* Primary potential pollutant sources have been identified as post development erosion/sedimentation and urban runoff (NMED 2014). EPA has not yet approved or established TMDLs for Sandia Canyon.

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

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. All referenced procedures will be provided in Attachments 21 and 22 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 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 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 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:

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-2108, *MSGP Routine Facility Inspections* (Attachment 16). Visual assessments are conducted in accordance with EPC-CP-QP-2105, *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 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) 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 comprising Impaired Waters monitoring for industrial activity identified in Tables 1-1 and 6-1 of the 2015 MSGP 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 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 **MSGP02901** as identified in Section 1.5. Discharge from the facility are to the east into Sandia Canyon (impaired waters), which is a tributary of the Rio Grande located approximately 10 miles east of the facility.

Outfall locations are shown on the site map provided in Figure B-1.

Monitoring will continue annually for constituents associated with impaired waters until that 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 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
- 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-TP-2103, Inspecting ISCO Stormwater Runoff Samplers and Retrieving Samples (Attachment 19)
- EPC-CP-QP-2106, Processing MSGP Stormwater Samples (Attachment 20).

# 4.7.1 Required Monitoring for CY 2021

Permitted Facility: TA-60 MRF

Outfall: 029(60-MRF-1)

Monitored Outfall	Monitoring Requirement	Industrial Sector	Assessment Unit	Analyte	Filtered/ Unfiltered	Regulatory Standard	Units	Regulatory Standard Type	Regulatory Standard Reference
	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
029	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
	Quarterly Benchmark	N2				No Benchm	ark Mor	nitoring Required	

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

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

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

BMP	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

#### 8.0 SWPPP CERTIFICATION

# STORMWATER POLLUTION PREVENTION PLAN TA-60 Material Recycling Facility 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.

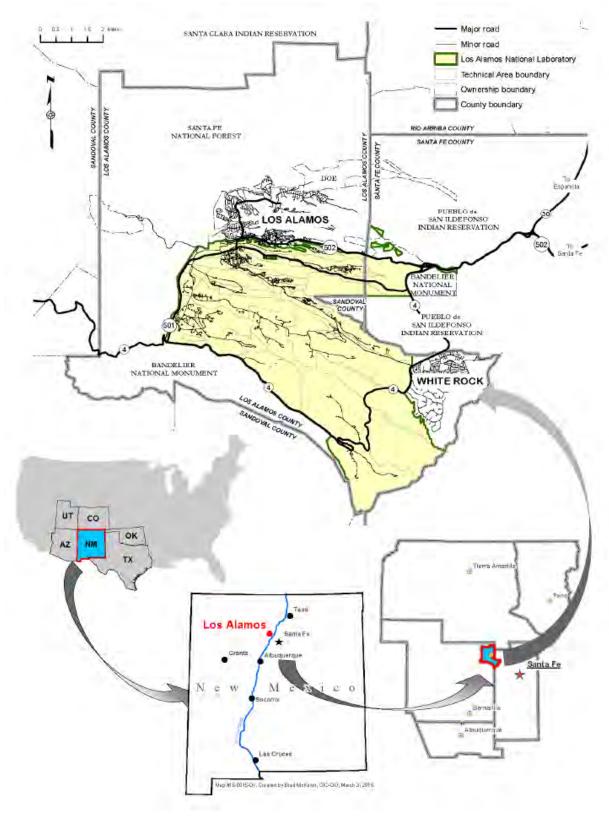
Signature

Phillip E. Ulibarri

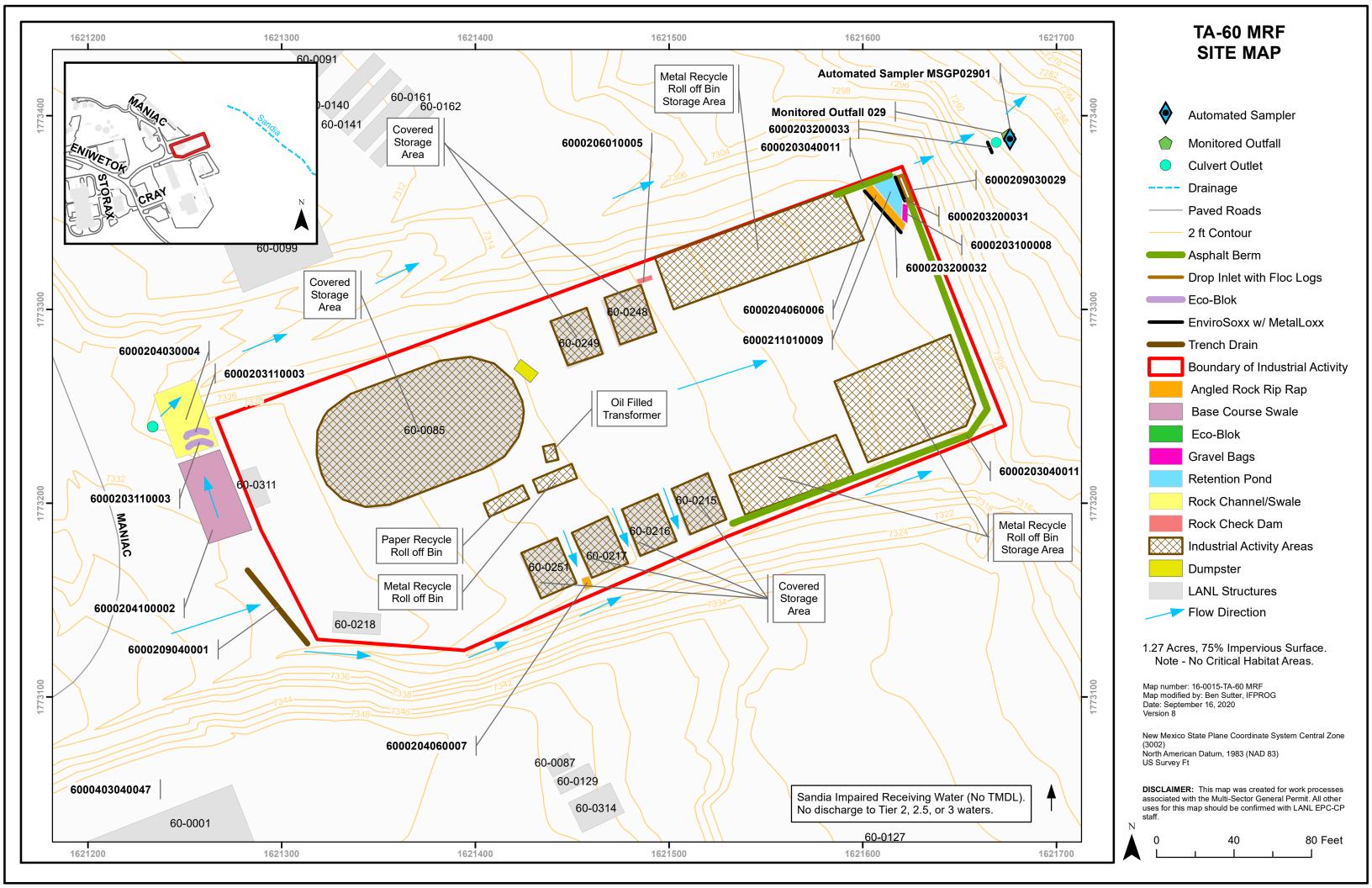
**Operations Manager 3** 

Utilities and Institutional Operations, UI-OPS

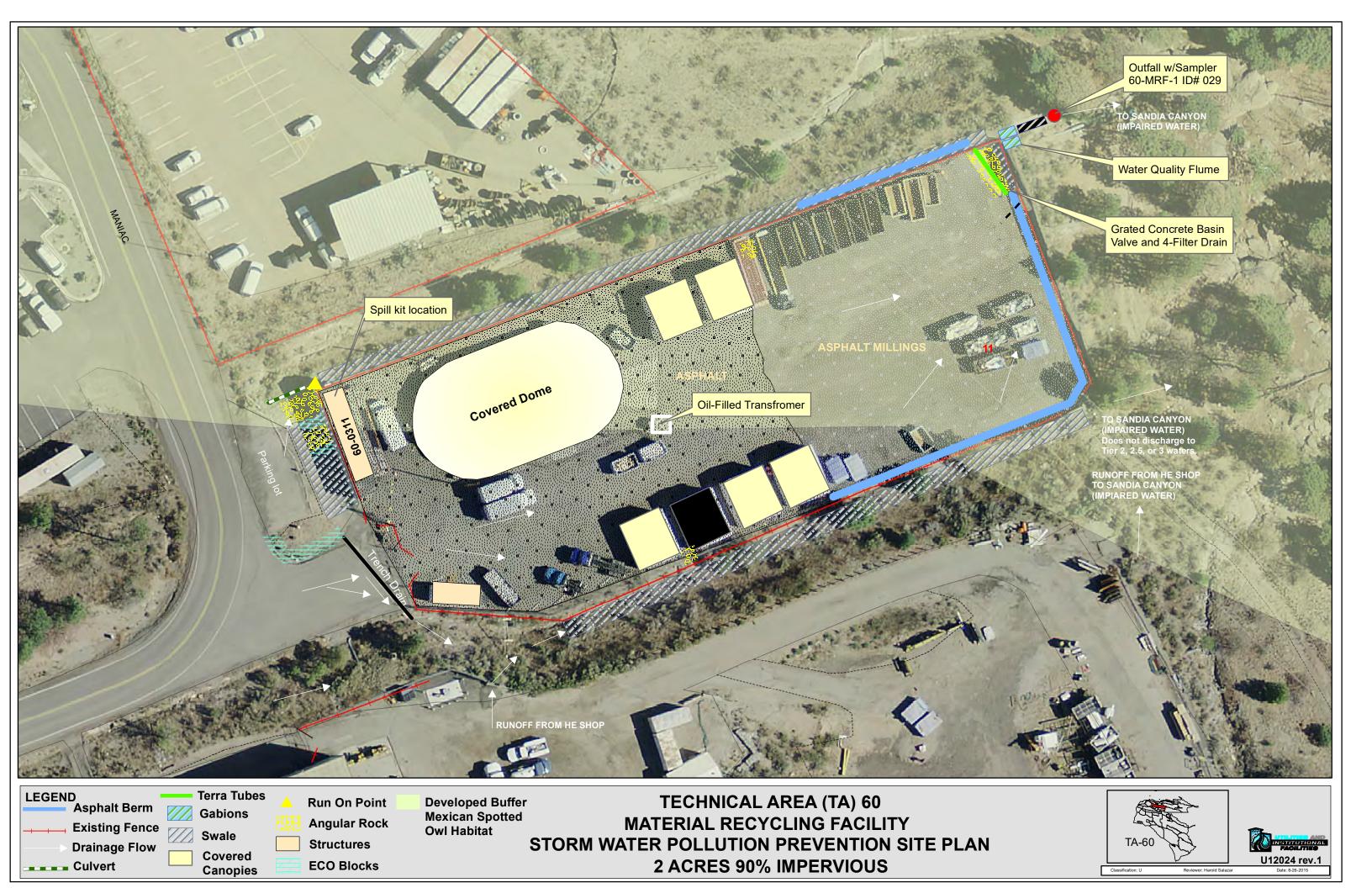
FIGURE A: GENERAL LOCATION MAP



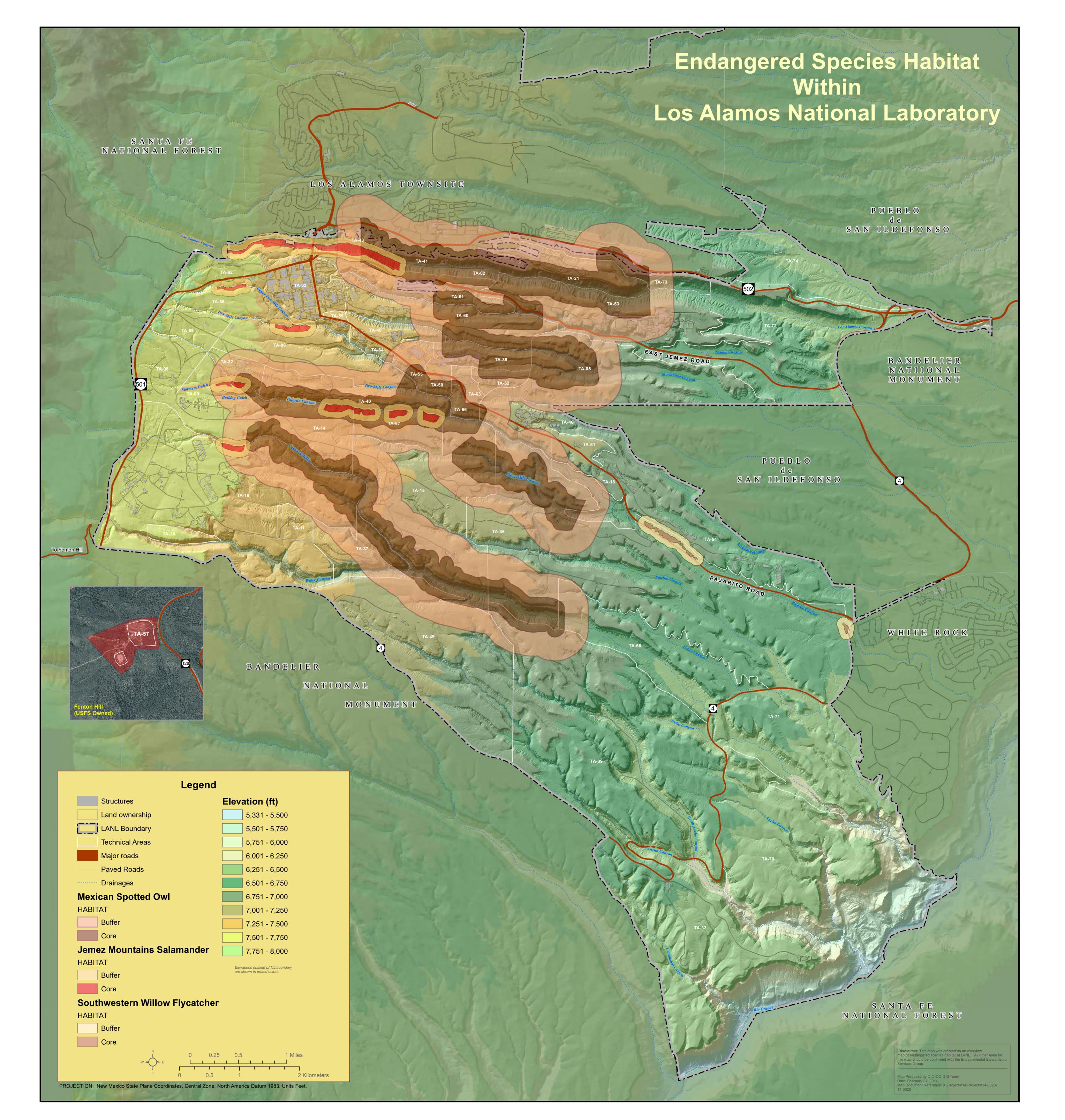
# FIGURE B-1: FACILITY SITE MAP



# FIGURE B-2: NEARBY RECEIVING WATERS



### FIGURE B-3: LANL ENDANGERED SPECIES MAP



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



Environmental Protection & Compliance Division Compliance Programs Group (EPC-CP)

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

Symbol: EPC-DO: 20-275

LA-UR: 20-26620

Date: JAN 1 8 2021

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 remove three substantially identical outfalls from permit coverage 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) 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 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).



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,

Taunia Van Valkenburg

Environmental Protection & Compliance Division

Compliance Programs

Triad National Security, LLC

TVV/TWL/LJD:jdm

Attachment(s): Attachment 1 EPA Guidance to Submit Change NOI Information via EPA Form 3510-6

Attachment 2 EPA Region 6 Approval for Triad National Security, LLC to

Submit a Paper NOI

Attachment 3 Change NOI for Stormwater Discharges Associated with Industrial

Activity under the NPDES Multi-Sector General Permit

Copy: Nasim Jahan, EPA Region 6, jahan.nasim@epa.gov

Helen Nguyen, EPA Region 6, nguyen.helen@epa.gov

Sarah Holcomb, NMED/SWQB, sarah.holcomb@state.nm.us

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

Maxine M. McReynolds, Triad, GC-ESH, mcreynolds@lanl.gov

Taunia S. Van Valkenburg, Triad, EPC-CP, tauniav@lanl.gov

Terrill. W. Lemke, Triad, EPC-CP, tlemke@lanl.gov

Holly L. Wheeler, Triad, EPC-CP, hbenson@lanl.gov

Leslie J. Dale, Triad, EPC-CP, leslie@lanl.gov

epccorrespondence@lanl.gov

adesh-records@lanl.gov



### Attachment 1

EPA Guidance to Submit Change NOI Information via EPA Form 3510-6

EPC-DO: 20-275

LA-UR-20-26620

Date: JAN 1 8 2021

From: Emily Hack (Avanti) (EPA NeT Support)

Cc: Jahan Nasim; Wheeler, Holly Lynn; Dale, Leslie J; Hazen, Michael W
Subject: 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

His part Lypna your county dispayed they be

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)

Civil 100 Fill 11/1101

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

The entails a series from LPA Not Support, below set by Zendesk

### Attachment 2

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

EPC-DO: 20-275

LA-UR-20-26620

Date: JAN 1 8 2021

### 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

FYL

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

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.
- 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).
- 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

### Attachment 3

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

EPC-DO: 20-275

LA-UR-20-26620

Date: JAN 1 8 2021

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.

A. Approval to Use	Paper NOI Form	
	ranted a waiver from electronic reporting from the EPA Regional Office*?	
	ch waiver you have been granted, the name of the EPA Regional Office staff person who granted the waiv	ver, and the date of approval:
Waiver grante	d. The owner/operator's headquarters is physically located in a geographic area (i.e., ZIP code of	census tract) that is identified
waiver granie	as under-served for broadband Internet access in the most recent report from the Federal Com	nmunications 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: 09 / 26 / 20 18 Note: This form is submitting Change NOI information in the submitted in the su	nation. Modified
must file this form	uired to obtain approval from the applicable EPA Regional Office prior to using this paper NOI form. If you h electronically using the NPDES eReporting Tool (NeT) at <u>http://water.epa.gov/polwaste/npdes/stormwater/</u> General-Permit.ctm	ave not obtained a waiver, you Stormwater-eNOI-System-for-
B. Permit Informati	ion NPDES ID (EPA Use Only):	NMR 0 5 0 0 1 3
1. Master Permit Nun	nber: (see Appendix C of the MSGP for the list of eligible master permi	t 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 und	er an NPDES permit?
☐ YES ☐ NO		
	the NPDES ID if you had coverage under EPA's 2008 MSGP or the NPDES ID if you had coverage under an EF	PA
individual perm		
C. Facility Operat	or Information	
1. Operator Informat	fion:	
Operator Name:		
Mailing Address:		
Street:		
City:		
Carrett as Similar Ca	overnment Subdivision:	
County or similar Go	iveriment subdivision.	
Phone:	Ext	
E-mail:		
2. Operator Point of	Contact Information:	1781134
First Name, Middle Ir	nitial, Last Name:	
Title:		
3. NOI Preparer Info	rmation (Complete if NOI was prepared by someone other than the certifier):	with V draw with
First Name, Middle Ir	nitial, Last Name:	
Organization:		
Phone:		
F === 3.		

D. Facility Information
1. Facility Name:
2. Facility Address:
Street/Location:
City:
County or Similar Government Subdivision:
3. Latitude/Longitude for the facility:
Latitude: "N (decimal degrees) Longitude: "W (decimal degrees)
Latifude/Longitude Data Source:
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? YES NO 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 Gounty Government   Privately Owned Facility   Municipality   County Government
☐ Corporation ☐ State Government ☐ Tribal Government ☐ School District
☐ Mixed Ownership (e.g. ☐ Municipal or Water Public/Private) District
7. Estimated area of industrial activity at your facility exposed to stormwater:
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:
Identify the applicable sector(s) and subsector(s) of any co-located industrial activity for which you are requesting permit coverage:
Sector:   Subsector:   Sector:   Subsector:   Subsector:
Sector:   Subsector:   Sector:   Subsector:   Subsector:
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? YES NO  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
Uranium, Radium,
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 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.   YES
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, Subpart C	Runaff from material storage piles at cement manufacturing facilities	E	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 povement deicing at existing and new primary airports with 1,000 or more annual non-propeller aircraft departures	s	6/15/2012	

INSPS 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:			
Outfall ID				TMDL Name and ID:			
Latitude				Pollutant(s) for which there is a TMDL:			
Longitude							
Outfall ID	006	Sandia Canyon (Sigma Canyon to NPDES outfall 001)		TMDL Name and ID:			
Latitude		Remove SIO from permit coverage effective June 18, 2020.		Pollutant(s) for which there is a TMDL:			
Longitude							

Outfall ID	007	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	TMDL Name and ID:
Latitude		Remove SIO from permit coverage effective June 18, 2020.	Pollutant(s) for which there is a TMDL:
Longitude		2020.	
lf substantic	ılly identical to	other outfall, list identical outfall ID: 009	
Outfall ID	041	Mortandad Canyon (within LANL)	TMDL Name and ID:
Latitude		Remove SIO from permit coverage effective July 22, 2020.	Pollutant(s) for which there is a TMDL:
Longitude			
If substantic	lly identical to	other outfall, list identical outfall ID: 042	
Outfall ID			TMDL Name and ID:
Collail ID			
Latitude			Pollutant(s) for which there is a TMDL:
Longitude			
If substantio	ally identical to	other outfall, list identical outfall ID:	
Outfall ID			TMDL Name and ID:
Latitudo			Pollutant(s) for which
Latitude			there is a TMDL:
Longitude	-		

4. Provide the following Information	ion about your outf	all latitude langitud	de:		
Lalitude/Longitude Data Source		□GP			
If you used a USGS topograp		the scale?			
		□ NAD 83	☐ WGS 84		
Horizontal Reference Datum: 5. Does your facility discharge in	T 1.0 16 12		7-1 1 1 1 1 1 1 1 1	Пио	
		aidle storm sewer a	system (MS4)4 LT 125		
If yes, provide the name of		A Sec		Little 1 and Legite and a project of project and proje	os a lier 2 for lier
<ol> <li>Check if you discharge to an 2.5) water (water quality excurater (Outstanding National</li> </ol>	eeds levels necessa	ry to support propo	ignated by the state of agation of fish, shellfish	tribal authority under its antidegradation policy and wildlife and recreation in and on the water)	or as a Tier 3
☐ Tier 2/2,5. Provide the name(	s) of receiving wate	r(s):			
☐ Tier 3 (Oulstanding National					
antidegradation purposes un	der 40 CFR 131.13(a	)(3).		designated as Tier 3 (outstanding national resour , what is the hardness of your receiving water(s) (	
(mg/L)					consultation
☐ YES ☐ NO				, does your facility discharge into any saltwater re	aceiving waters
9. Does your facility discharge to	o a federal CERCLA	site listed in Apper	ndix P? YES NO	FRA Resissasi Office delember that view are after	ble for permit
coverage pursuant to Part	1.1.4.10*2 YES	LINO		EPA Regional Office determine that you are eligi	
* Note: If you discharge to a fe Office in advance and the EF	deral CERCLA site li	sted in Appendix P letermines you are	eligible coverage un	coverage under this permit unless you notify the t er this permit. In determining your eligibility for co s and/or procedures to ensure that your discharg le to an exceedance of a water quality standard	es will not lead to
F. Stormwater Pollution Prev	ention Plan (SWPF	P) Information			
1, Has the SWPPP been prepare	d in advance of filir	ng this NOI, as requ	ired? YES NO	5	
2. SWPPP Contact Information:			0.00		X 1
First Name, Middle Initial, Last N	ame: [н а 1 1	v	L W	heeler	
Professional Title:	i ronmen	tal Pro	fession	1	
Phone: 5 0 5 -	6 6 7 - 1 3 1	2 Ext.	1111 700 (1111)		
E-mail: n b e n	s o n 8 1 a n	1 . g o v			
SWPPP Availability:     Your current SWPPP or certain ir     provide the required information	ntormation from you n*:	r SWPPP must be m	nade available throug	n one of the following two options. Select one of	the options and
* Note: You are not required to redacted), but you must clearly	nost any confidenti	al business informa ons of the SWPPP th	ation (CBI) or restricted nat are being withheld	information (as defined in Appendix A) (such info from public access.	ormation may be
Option 1: Maintain a current	copy of your SWPP	P on an Internet po	age (Universal Resourc	e Locator or URL).	
Provide the web address URL: e	prr.lanl.gov				
Option 2: Provide the following		your SWPPP:			
	al activilies exposed		g., material storage; ec	uipment fueling, maintenance, and cleaning; cu	itting steel beams)

B. 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. 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):
D. Provide a schedule for good housekeeping and mainlenance (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  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.  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 NQI authorized under this permif:  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":
<ul> <li>b. Using the Appendix E worksheet, check which of the following is applicable to your facility and answer any corresponding questions:</li> <li>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.</li> </ul>
Date your Criterion C Eligibility Form was sent to EPA://
☐ 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.  Date your Criterion C Eligibility Form was sent to EPA:

H. Historic	Preservation	n				
☐ YES	s 🗆 NO			ry lands, is your facility located on a pi associated with the property:	roperty of religious or cu	ultural significance to an Indian tribe?
	he instruction			SGP, under which historic properties pr	reservation criterion liste	ed in Part 1.1.4.6 are you eligible for coverage
	□в	□с	□ D			
I. Certifico	ation Inform	ation				
to assure system, or and com violations	that qualifier those perso plete. I am	ed personne ons directly aware that	el properly gath	nered and evaluated the information gathering the information, the inform ficant penalties for submitting false info	submitted. Based on m ation submitted is, to th	supervision in accordance with a system designed y inquiry of the person or persons who manage the ne best of my knowledge and belief, true, accurate, possibility of fine and imprisonment for knowing
Title:	D	ivis	ion L	eader		
Signature	9	9	200	ze-		Date: 61/18/2021
E-mail:	ازا	playn	e@lan	1 .gov	ШШШ	



Environmental Protection & Compliance Los Alamos National Laboratory PO Box 1663, K490 Los Alamos, New Mexico 87545 (505) 667-0666

Date:

APR 2 3 2018

Symbol: EPC-DO: 18-165

LA-UR:

18-23181

Locates Action No.:

N/A

Helen Nguyen NetDMR & ICIS-NPDES Coordinator Surface Water Compliance Section (6EN-WC) U.S. EPA, Region 6 1445 Ross Avenue, Suite 1200 Dallas, TX 75202-2733

Subject: National Pollutant Discharge Elimination System (NPDES) Permit Tracking No. NMR053195, Multi-Sector General Permit (MSGP) Change Notice of Intent (Change NOI) Reporting Pursuant to Part 7.4

Dear Ms. Nguyen:

The purpose of this letter is to submit Change NOI information to modify outfall and monitoring requirements related to MSGP Permit Tracking No. NMR053195. Due to system limitations, Los Alamos National Security (LANS) was previously unable to submit a complete and accurate NOI using the MSGP NeT reporting tool, and was granted a waiver to submit paper NOI forms by Nasim Jahan on February 9, 2016. As LANS submitted a paper NOI, subsequent Change NOIs or Notice of Termination (NOTs) must also be submitted via the paper form.

Additionally, pursuant to MSGP Part 9.6.2, Permittees in New Mexico must also comply with benchmark values that are modified to reflect New Mexico water quality standards based on the Standards for Interstate and Intrastate Surface Waters (20.6.4.900 NMAC). These modified benchmarks, as well as New Mexico impaired waters standards, are currently not incorporated into the electronic reporting tools so as to automatically populate correct monitoring requirements in NetDMR. EPA R6 is aware of this issue and has previously assisted in the resolution of LANS' limit sets in NetDMR. Per discussion during our meeting on March 29, 2018, LANS is requesting the assistance of EPA R6 to facilitate implementation of the enclosed Change NOI to ensure assignment of the correct monitoring requirements in NetDMR. The Change NOI is included in Enclosure 1; correct limit sets for new monitored outfall 017 are included in Enclosure 2. The Change NOI needs to be implemented no later than the end of LANS' monitoring period 1, May 31, 2018, to allow accurate reporting in NetDMR by the DMR due date of July 30, 2018.



Your assistance is appreciated as LANS 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,

Taumia S. Van Valkenburg

Group Leader

Environmental Compliance Programs Los Alamos National Security, LLC

TSV:TWL:LJD:eim

Enclosures: 1) Change NOI for MSGP Permit Tracking No. NMR053195

2) Limit Sets to Assign to Monitored Outfall 017 in NetDMR for Permit Tracking

No. NMR053195

Copy: Karen E. Armijo, NA-LA, (E-File)

Timothy A. Dolan, LC-ESH, (E-File)

William R. Mairson, ADESH, (E-File)

Benjamine B. Roberts, 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)

Ellena I. Martinez, EPC-CP, (E-File)

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

epc-correspondence@lanl.gov, (E-File)

## **ENCLOSURE 1**

Change NOI for MSGP Permit Tracking No. NMR053195

EPC-DO: 18-165

LA-UR-18-23181

Date: APR 2 3 2018

NPDES FORM 3510-6



# United States Environmental Protection Agency Washington, DC 20460 ICE OF INTENT (NOI) FOR STORMWATER DISCHARGES ASSOCIATED V

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.

riever eligible for	permit coverage, keller to the instructions of the end of this form to complete your Not.
A. Approval to	Use Paper NOI Form
1. Have you been	n granted a waiver from electronic reporting from the EPA Regional Office*?
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 approval:
Waiver gra	nted: 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 El	PA staff person that granted the waiver: Nasim Jahan
Dale appro	oval obtained: 0 2 / 0 9 / 2 0 1 6 Note: This form is submitting Change NOI information. Modified items/sections are highlighted.
must file this for	required to abtain approval from the applicable EPA Regional Office prior to using this paper NOI form. If you have not obtained a waiver, you rm electronically using the NPDES eReporting Tool (NeT) at <a href="http://water.epa.gov/polwaste/npdes/stormwater/Stormwater-eNOI-System-for-or-General-Permit.ctm">http://water.epa.gov/polwaste/npdes/stormwater/Stormwater-eNOI-System-for-or-General-Permit.ctm</a>
B. Permit Inform	nation NPDES ID (EPA Use Only):  N M R   0   5   3   1   9   5
1. Master Permit N	Number: (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? TYES 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?
☐ YES ☐	NO
If yes, provid individual pe	de the NPDES ID if you had coverage under EPA's 2008 MSGP or the NPDES ID if you had coverage under an EPA ermit:
C. Facility Oper	rator Information
1. Operator Inform	nation:
Operator Name:	
Mailing Address:	
Street:	
City:	State: ZIP Code: -
County or Similar	Government Subdivision:
Phone:	
E-mail:	
	of Contact Information:
	e Initial, Last Name:
risi Name, Middle	a inimal, casi Name:
Title:	
3. NOI Preparer In	formation (Complete if NOI was prepared by someone other than the certifier):
First Name, Middle	e 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/Longifude for the facility:
Lafitude:° N (decimal degrees) Longitude:° W (decimal degrees)
Latitude/Longitude Data Source:
If you used a USGS topographic map, what was the scale?
Horizonfal Reference Datum: □ NAD 27 □ NAD 83 □ WG\$ 84
4, Is your facility located on Indian Country lands? TES NO 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 awnership type of the lacifity (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
125.25
7. Estimated area of industrial activity at your facility exposed to stormwater; (to the nearest quarter acre)  8. Sector-Specific Information
Identify the 4-digit Standard Industrial Classification (SIC) code or 2-letter Activity Cade 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: Subsector:
Identify the applicable sector(s) and subsector(s) of any co-located industrial activity for which you are requesting permit coverage:
Sector:   Subsector:   Sector:   Subsector:   Subsector:
enter III enter IIII enter III enter III enter III enter III
Sector: Subsector: Sector: Subsector: Subsec
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? 📗 YES 🔠 NO
If you are a Sector G (Metal Mining) facility, do you have discharges from waste rock and overburden piles?
Check the type of ore you mine at your facility:
☐ 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?*
* Note that if your facility becomes inactive and unstaffed during the permit ferm, 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.    YES
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, Subpart C	Runoff from material storage piles at cement manufacturing facilities	E	2/20/1974	
Part 418 Subpart A	Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, linished product, by-products or waste products (SIC 2874)	c	4/8/1974	п
Part 423	Coal pile runoff at steam electric generaling facilities	0	11/19/1982 10/8/1974 <sup>1</sup>	
Parl 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	1	N/A	0
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	
Parl 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	п

INSPS 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: (Altach a separate list if necessary)

mies 11 11 - 11 - 11 - 11 - 11 - 1	e stormwater outfalls	For each outfall, provide the following receiving water information:					
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.		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:			
Outfall ID	offeil ID (Sector AA, F) Sandia Canyon Canyon to NPDE 001)		01040 Copper, dissolved [as Cu]; 01057 Thallium, dissolved [as Tl]; 01104	TMDL Name and ID: N/A			
Latitude	35.872834	Note: Remove Outfall 018. Outfall no longer exists and	Aluminum, total recoverable; 39516 Polychlorinated biphenyls [PCBs]; 51931	Pollutant(s) for which there is a TMDL:			
Longitude	-106.317653	was replaced by Outfall 017 as the monitored outfall effective December 17, 2016.	Alpha, gross adjusted	N/A			
Outfall ID	017 (Sector AA, F)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01040 Copper, dissolved [as Cu]; 01057 Thallium, dissolved [as Tl]; 01104 Aluminum, total recoverable; 39516	TMDL Name and ID: N/A			
Latitude	35.872599	Note: Change Outfall 017 from an SIO to a monitored outfall. Outfall 017 replaced Outfall 018 as the monitored outfall effective December 17, 2016 and is		Pollutant(s) for which there is a TMDL:			
Longitude	-106.317066 associated with the SIOs listed below. In ICIS, please assign the limit sets provided in Enclosure 2 of this submittal.		Polychlorinated biphenyls [PCBs]; 51931 Alpha, gross adjusted	N/A			

Outfall ID	013 (Sector AA, F)	Mortandad Canyon (Within LANL)	01040 Copper, dissolved [as Cu]; 01104 Aluminum, total	N/A
Latitude	35.870797		recoverable; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.317867		51931 Alpha, gross adjusted	IN/A
If substantio	l ally identical to other o	utfall, list identical outfall ID: 017		
Outfall ID	014 (Sector AA, F)	Mortandad Canyon (Within LANL)	01040 Copper, dissolved [as Cu]; 01104 Aluminum, total	TMDL Name and ID: N/A
Latitude	35.870890		recoverable; 39516 Polychlorinated biphenyls [PCBs];	Pollutant(s) for which there is a TMDL:
Longitude	-106.317393		51931 Alpha, gross adjusted	N/A
If substantic	l ally identical to other o	utfall, list identical outfall ID: 017		
lf substantic	015 (Sector AA, F)	utfall, list identical outfall ID: 017  Mortandad Canyon (Within LANL)	01040 Copper, dissolved [as Cu]; 01104 Aluminum, total	TMDL Name and ID:
J.U	015	Mortandad Canyon (Within		N/A  Pollutant(s) for which there is a TMDL:
Ouffall ID	015 (Sector AA, F)	Mortandad Canyon (Within	dissolved [as Cu]; 01104 Aluminum, total recoverable; 39516 Polychlorinated	N/A  Pollutant(s) for which
Outfall ID  Latitude  Longitude	015 (Sector AA, F) 35.871389 -106.316397	Mortandad Canyon (Within	dissolved [as Cu]; 01104 Aluminum, total recoverable; 39516 Polychlorinated biphenyls [PCBs]; 51931 Alpha, gross	N/A  Pollutant(s) for which there is a TMDL:
Outfall ID  Latitude  Longitude	015 (Sector AA, F) 35.871389 -106.316397	Mortandad Canyon (Within LANL)  utfall, list identical outfall ID: 017  Sandia Canyon (Sigma Canyon to NPDES outfall	dissolved [as Cu]; 01104 Aluminum, total recoverable; 39516 Polychlorinated biphenyls [PCBs]; 51931 Alpha, gross	N/A  Pollutant(s) for which there is a TMDL:
Outfall ID  Latitude  Longitude	015 (Sector AA, F) 35.871389 -106.316397	Mortandad Canyon (Within LANL)  utfall, list identical outfall ID: 017  Sandia Canyon (Sigma	dissolved [as Cu]; 01104 Aluminum, total recoverable; 39516 Polychlorinated biphenyls [PCBs]; 51931 Alpha, gross adjusted  01040 Copper, dissolved [as Cu]; 01057 Thallium,	N/A  Pollutant(s) for which there is a TMDL:  N/A  TMDL Name and ID:

Outfall ID	019 (Sector AA, F)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01040 Copper, dissolved [as Cu]; 01057 Thallium, dissolved [as TI]; 01104	TMDL Name and ID:
Latitude	35.872682		Aluminum, total recoverable; 39516 Polychlorinated	Pollutant(s) for which there is a TMDL:
Longitude	-106.318467		biphenyls [PCBs]; 51931 Alpha, gross adjusted	N/A
If substantia	I ally identical to other o	outfall, list identical outfall ID: 017		
Outfall ID	004 (Sector AA)	Two Mile Canyon (Pajarito to headwaters)	01104 Aluminum, total recoverable; 39516 Polychlorinated	TMDL Name and ID: N/A
Latitude	35.8714131	Note: Remove Outfall 004. Site achieved No Exposure	biphenyls [PCBs]; 51931 Alpha, gross adjusted	Pollutant(s) for which there is a TMDL:
Longitude	-106.323832	status effective July 17, 2017.		N/A
If substantia	l ally identical to other o	outfall, list identical outfall ID:		
If substantia	047 (Sector K)	Canada del Buey (within LANL)	01104 Aluminum, total recoverable; 39516	TMDL Name and ID:
	047	Canada del Buey (within LANL)  Note: Remove Outfall 047 and associated SIOs listed	recoverable; 39516 Polychlorinated biphenyls [PCBs]; 51931 Alpha, gross	N/A
Outfall ID	047 (Sector K)	Canada del Buey (within LANL)  Note: Remove Outfall 047	recoverable; 39516 Polychlorinated biphenyls [PCBs];	N/A Pollutant(s) for which
Outfall ID  Latitude  Longitude	047 (Sector K) 35.844895 -106.264513	Canada del Buey (within LANL)  Note: Remove Outfall 047 and associated SIOs listed below. Site achieved No Exposure status effective	recoverable; 39516 Polychlorinated biphenyls [PCBs]; 51931 Alpha, gross	N/A  Pollutant(s) for which there is a TMDL;
Outfall ID  Latitude  Longitude	047 (Sector K) 35.844895 -106.264513	Canada del Buey (within LANL)  Note: Remove Outfall 047 and associated SIOs listed below. Site achieved No Exposure status effective March 20, 2018.	recoverable; 39516 Polychlorinated biphenyls [PCBs]; 51931 Alpha, gross adjusted  01104 Aluminum, total recoverable; 39516	N/A  Pollutant(s) for which there is a TMDL;
Outfall ID  Latitude  Longitude	047 (Sector K) 35.844895 -106.264513	Canada del Buey (within LANL)  Note: Remove Outfall 047 and associated SIOs listed below. Site achieved No Exposure status effective March 20, 2018.	recoverable; 39516 Polychlorinated biphenyls [PCBs]; 51931 Alpha, gross adjusted	N/A  Pollutant(s) for which there is a TMDL:  N/A

Outfall ID	045 (Sector K)	Canada del Buey (within LANL)	01104 Aluminum, total recoverable; 39516 Polychlorinated	N/A			
Latitude	35.845586		biphenyls [PCBs]; 51931 Alpha, gross adjusted	Pollutant(s) for which there is a TMDL:			
Longitude	-106.265214			N/A			
If substantie	ally identical to other	outfall, list identical outfall ID: 047					
Outfall ID	046 (Sector K)	Canada del Buey (within LANL)	01104 Aluminum, total recoverable; 39516 Polychlorinated	TMDL Name and ID: N/A			
Latitude	35.845200		biphenyls [PCBs]; 51931 Alpha, gross adjusted	Pollutant(s) for which there is a TMDL:			
Longitude	-106.264844			N/A			
If substantio	ally identical to other	outfall, list identical outfall ID: 047					
Outfall ID	048 (Sector K)	Canada del Buey (within LANL)	01104 Aluminum, total recoverable; 39516 Polychlorinated	TMDL Name and ID: N/A			
	35.844590		biphenyls [PCBs]; 51931 Alpha, gross	Pollutant(s) for which there is a TMDL:			
Latitude	50,07,1040		adjusted	6146			
	-106.265044		adjusted	N/A			
Longitude	-106.265044	outfall, list identical outfall ID: 047	adjusted	N/A			
Longitude	-106.265044	outfall, list identical outfall ID: 047	adjusted	N/A  TMDL Name and ID:			
Longitude If substantic Outfall ID	-106.265044	outfall, list identical outfall ID: 047	adjusted	TMDL Name and ID:			
Longitude If substantio	-106.265044	putfall, list identical outfall ID: 047	adjusted	TMDL Name and ID:			

9. WOT 2 WO TH A COURT	16.5%	6.7		- 6			COL.		- 10	J.F	ar er	dia.		177	0.4				-	_	_	_	_	_	_	_	_	_	_	_	_	_	_	_	_	_		_	_	_		-	_	_
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8, If you are subject		-		nar	k m	noni	torir	ng	req	uire	eme	ent	s fo	ra	har	dr	ess	-de	ере	enc	der	nt n	net	al,	do	es	yo	ur f	icil	ity	disc	ha	ge ir	nlo	any	/ sal	iltw	vat	err	ec	eivi	ng	wal	ers?
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F. Stormwater Po	llutio	on I	Pre	ver	ntlo	on F	lar	1 (5	WP	PP	) In	fo	rme	atle	on	Ī																												
1. Has the SWPPP b	een	pre	pa	red	inx	adv	and	cer	of fil	inc	thi:	5 N	101.	as	reo	nioi	ed	s l		YES			N	0	_	_	_		_			_					_	_				_		
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3. SWPPP Availabilit Your current SWPPP provide the require * Note: You are not redacted), but you  Option 1: Mainta Provide the web ac Option 2: Provide A. Describe your on and potential spi	or o	form puire it cle cur ss Uf e foll indu	matin ed to earl men RL_ llow	on* o po ly ic  nt co  ving ial c	ost oby	any itify	tho:	on I	deni port WPF	tial tion	bus is of	sin I th	ess ie S Inte	info WP	PP t	iali	lon it a	(C re l	BI) bei	or ng	res wil	tric	ted eld urc	d in	Loc	pu	blio or o	n (e	RL)	lef	ned	In	Арр	end	dix A	A) (s	suc	ch i	info	orm	atio	on r	nay	be

i, List the pollutant(s) or pollutant constituent(s) associated with each industrial activity exposed to stormwater that could be discharged in stormwater and an authorized non-stormwater discharges listed in Part 1.1.3:
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 ony other measures taken to comply with the requirements in Part 2.2 Water Quality-Based Effluent Limitations (see Part 5,2,4):
a. 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):
5. Endangered Species Protection
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.  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);
If you select criterion B, provide the NPDES ID from the other operator's NOI authorized under this permit:
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 Eligibility Form was sent to EPA:
☐ 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.  Date your Criterion C Eligibility Form was sent to EPA:
If you select criterion D or E, you must altach copies of any letters or other communications with the U.S. Fish and Wildlife Service or National Marine Fisheries Service.

H. Historic	Preservatio	on								
☐ YES	□ NO			y lands, is your facility to associated with the pro		perty of religious or o	cultural signific	cance to an Ir	ndian tribe?	
		ns in Appe only check		GP, under which historic	c properlies pre	servation criterion lis	ed in Parl 1.1	.4.6 are you e	ligible for covero	ige
	□в	□с	□ D							
I. Certificat	ion Inform	aflon								
to assure to system, or	nal qualifie Those perso	ed personne ons directly	el properly gathe responsible for g	I and all attachments vered and evaluated the gathering the informaticant penalties for subm	e information su ion, the informa	bmitted. Based on n tion submitted is, to t	ny inquiry of the he best of my	he person or p knowledge o	persons who man and belief, true, o	nage the
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## **ENCLOSURE 2**

Limit Sets to Assign to Monitored Outfall 017 in NetDMR for Permit Tracking No. NMR053195

EPC-DO: 18-165

LA-UR-18-23181

Date: APR 2 3 2018

#### Limit Sets to Assign to Monitored Outfall 017 in NetDMR

Permit ID	Facility	Permitted Feature	Discharge #	Discharge Description	Parameter Code	Parameter Name	Symbol	Quality Value	Limit Type	Units	Freq. of Analysis	10000	Monitoring Period Begin Date	Monitoring Period End Date	DMR Due Date
NMR053195	TA-3-66 Sigma Complex	017	017-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	4/1	5/31	7/31
VMR053195	TA-3-66 Sigma Complex	017	017-11	11- Fabricated Metal Products, except Coating	0110410	Aluminum, total recoverable [as Al]	<=	681	Maximum	ug/L	1/60	Gr	4/1	5/31	7/31
NMR053195	TA-3-66 Sigma Complex	017	017-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68	Maximum	mg/L	1/60	Gr	4/1	5/31	7/31
VMR053195	TA-3-66 Sigma Complex	017	017-11	UC - Copper: Water Hardness 50-74.99 mg/L	01040 1 0	Copper, dissolved [as Cu]	<=	6	Maximum	ug/L	1/60	Gr	4/1	5/31	7/31
NMR053195	TA-3-66 Sigma Complex	017	017-11	ZC - Zinc: Water Hardness 50-74.99 mg/L	0109010	Zinc, dissolved [as Zn]	<=	76	Maximum	ug/L	1/60	Gr	4/1	5/31	7/31
VMR053195	TA-3-66 Sigma Complex	017	017-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	6/1	7/31	9/30
VMR053195	TA-3-66 Sigma Complex	017	017-11	11- Fabricated Metal Products, except Coating	0110410	Aluminum, total recoverable [as Al]	<=	681	Maximum	ug/L	1/60	Gr	6/1	7/31	9/30
VMR053195	TA-3-66 Sigma Complex	017	017-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68	Maximum	mg/L	1/60	Gr	6/1	7/31	9/30
NMR053195	TA-3-66 Sigma Complex	017	017-11	UC - Copper: Water Hardness 50-74.99 mg/L	01040 1 0	Copper, dissolved (as Cu)	<=	6	Maximum	ug/L	1/60	Gr	6/1	7/31	9/30
VMR053195	TA-3-66 Sigma Complex	017	017-11	ZC - Zinc: Water Hardness 50-74.99 mg/L	0109010	Zinc, dissolved [as Zn]	<=	76	Maximum	ug/L	1/60	Gr	6/1	7/31	9/30
VMR053195	TA-3-66 Sigma Complex	017	017-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	8/1	9/30	11/30
NMR053195	TA-3-66 Sigma Complex	017	017-11	11- Fabricated Metal Products, except Coating	0110410	Aluminum, total recoverable [as Al]	<=	681	Maximum	ug/L	1/60	Gr	8/1	9/30	11/30
NMR053195	TA-3-66 Sigma Complex	017	017-11	11- Fabricated Metal Products, except Coating	51450.10	Nitrite Plus Nitrate Total	<=	0.68	Maximum	mg/L	1/60	Gr	8/1	9/30	11/30
NMR053195	TA-3-66 Sigma Complex	017	017-11	UC - Copper: Water Hardness 50-74.99 mg/L	01040 1 0	Copper, dissolved [as Cu]	<=	6	Maximum	ug/L	1/60	Gr	8/1	9/30	11/30
NMR053195	TA-3-66 Sigma Complex	017	017-11	ZC - Zinc: Water Hardness 50-74.99 mg/L	01090 1 0	Zinc, dissolved [as Zn]	<=	76	Maximum	ug/L	1/60	Gr	8/1	9/30	11/30
NMR053195	TA-3-66 Sigma Complex	017	017-11	11-Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	10/1	11/30	1/31
NMR053195	TA-3-66 Sigma Complex	017	017-11	11- Fabricated Metal Products, except Coating	0110410	Aluminum, total recoverable [as Al]	<=	681	mumixsM	ug/L	1/60	Gr	10/1	11/30	1/31
NMR053195	TA-3-66 Sigma Complex	017	017-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68	Maximum	mg/L	1/60	Gr	10/1	11/30	1/31
NMR053195	TA-3-66 Sigma Complex	017	017-11	UC - Copper: Water Hardness 50-74.99 mg/L	01040 1 0	Copper, dissolved [as Cu]	<=	6	Maximum	ug/L	1/60	Gr	10/1	11/30	1/31
NMR053195	TA-3-66 Sigma Complex	017	017-11	ZC - Zinc: Water Hardness 50-74 99 mg/L	01090 1 0	Zinc, dissolved [as Zn]	<=	76	Maximum	ug/L	1/60	Gr	10/1	11/30	
NMR053195	TA-3-66 Sigma Complex	017	017-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=	6	Maximum	ug/L	1/YR	Gr	4/1	11/30	1/31
NMR053195	TA-3-66 Sigma Complex	017	017-IW	IW - Impaired Water	01057 1 0	Thallium, dissolved [as TI]	<=	0.47	Maximum	ug/L	1/YR	Gr	4/1	11/30	1/31
NMR053195	TA-3-66 Sigma Complex	017	017-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	681	Maximum	ug/L	1/YR	Gr	4/1	11/30	1/31
NMR053195	TA-3-56 Sigma Complex	017	017-IW	IW - Impaired Water	51931 1 0	Adjusted Gross Alpha	<=	15	Maximum	pCi/L	1/YR	Gr	4/1	11/30	1/31
NMR053195	TA-3-66 Sigma Complex	017	017-IW	IW - Impaired Water	3951610	Polychlorinated biphenyls [PCBs]	<=	0.2	Maximum	ug/L	1/YR	Gr	4/1	11/30	

EPC-DO-18-165



**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

3510-6

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, ALDESHOSS, 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	

## 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

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.
- 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).
- 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

Terrili 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: Jahan Nasim; Wheeler, Holly Lynn; Dale, Leslie J; Hazen, Michael W
Subject: 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

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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)

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

Description	JUN 1 1 2019	
Date:		

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 of	coverage. Refer to the instruction	ons at the end of this form to complete your NOL	
A. Approval to Use Pa	per NOI Form		
1. Have you been grante	d a waiver from electronic rep	orling from the EPA Regional Office*?	0
If yes, check which w	aiver you have been granted,	the name of the EPA Regional Office staff person who	granted the waiver, and the date of approval:
Waiver granted:		eadquarters is physically located in a geographic area adband Internet access in the most recent report from	
	The owner/operator has	s issues regarding available computer access or compu	uter capability.
Name of EPA staff	person that granted the waive		шшшшш
Date approval obt	tained: 09/26/	2018 Note: This form is submitting Chan- items/sections are highlighted.	ge NOI information. Modified
	tronically using the NPDES eRep	oplicable EPA Regional Office prior to using this paper N porting Tool (NeT) at http://water.epa.gov/polwaste/npc	
B. Permit Information		NPDES ID (EPA Use C	Only):  NMR 0 5 0 0 1 3
I. Master Permit Number:	ШШШ	(see Appendix C of the MSGP for the list of eligib	ole master permit numbers)
2. Are you a new dischard	aer or a new source as defined	In Appendix A? ☐ YES ☐ NO (If yes, skip to Part C o	of this form)
		e stormwater discharges from your facility been covered	
☐ YES ☐ NO			
If yes, provide the Ni individual permit:	PDES ID if you had coverage ur	nder EPA's 2008 MSGP or the NPDES ID if you had cover	age under an EPA
C. Facility Operator Ini	lormation		
1. Operator Information:			
Operator Name:			
Mailing Address:			
Street:			
City:	шшш		ZIP Code;
County or Similar Governr	ment Subdivision:		
Phone:	11-1111-111	Ext.	
E-mail:	ПППППП		
2. Operator Point of Confe	act Information:		
First Name, Middle Initial, l	Last Name:		
Title:		пининини	
3, NOI Preparer Information	on (Complete if NOI was prepa	red by someone ofher than the certifier):	
First Name, Middle Initial, L			
Organization:			
Phone:		Ext.	
E-mail:	HILLIAM	THE HILLIAM TO THE STATE OF THE	

D. Facility Information			
1. Facility Name:			
2. Facility Address:			
Street/Location:			
City:		State: ZIP Code:	
County or Similar Government Subdivision			
3. Lalitude/Longitude for the facility:			
Lalitude:°N (c	decimal degrees) Longitude;	• W (decimal degrees)	
Latitude/Longitude Data Source; 🔲 Mar	□ GPS □	Other	
If you used a USGS topographic map,	what was the scale?		
Horizontal Reference Datum: NAC	27 NAD 83 WGS 84		
4. Is your facility located on Indian Countr	y lands? YES NO		
If yes, provide the name of the India	n tribe associated with the area of Indian	country (including name of Indian reservation, if	applicable):
5. Are you requesting coverage under this	s 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. Public/Private)	Municipal or Water District	
7 Estimated area of industrial activity at y	our lacility exposed to starmwater 51	(to the nearest quarter acre)	
8, Sector-Specific Information			
		ode that best represents the products produced	
1 1 1 1 1	1.1.1	e sector and subsector of your primary industrial o	activity (See Appendix D);
Primary SIC Code: OR	Primary Activity Code:		
Sector: Subsector:	Note: REMOVE the following Sect	or/Subsector from permit coverage.	
Identity the applicable sector(s) and subs	sector(s) of any co-located industrial activ	rity for which you are requesting permit coverage	25
Sector: F Subsector: F4	Sector: Subsector:	Sector: Subsector:	
Sector:   Subsector:	Sector:   Subsector:	Sector:   Subsector:	
		Than 100,000 gallans of pure glycol in glycol-base	ed descina lluids and/or 100
lans or more of urea on an average		man regions gallions of pare gives in gives base	o doleng news anator rec
If you are a Sector G (Metal Mining)	facility, do you have discharges from was	te rock and overburden piles? YES NO	)
Check the type of ore you mine at y	our facility: Tungsten Ore	☐ Nickel Ore ☐ A	luminum 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 un			
* Note that if your facility becomes i	nactive and unstalled during the permit t	erm, you must submit an NOI modification to refle	ect the change.
E. Discharge Information			
non-stormwater discharges listed in Par under CWA section 402(k) by disclosure be covered by the permit, the Stormwo	t 1,1,3, Any discharges not expressly author to EPA, state, or local authorities after iss ater Pollution Prevention Plan (SWPPP), du	izes the allowable stormwater discharges in Part- prized in this permit cannot become authorized o uance of this permit via any means, including the ring an inspection, etc. If any discharges requiring rts 1.1.2 and 1.1.3 will be discharged, they must b	r shielded from liability Notice of Intent (NOI) to NPDES permit coverage
MLDE2 Delium P 152	to hon standing of the gest table in the	and the state of t	
Federal Effluent Limitation Guidelines	ia iai summa a asalia go iso any a		

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	E	2/20/1974	
Part 418 Subpart A	Runoff from phosphate fertilizer manufacturing facilifies that comes into contact with any raw materials, linished product, by-products or waste products (SIC 2874)	Ċ	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	٨	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	,	N/A	п
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	п

INSPS 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)

3621 (20) 20 HO	e stormwater outfalls	For each outfall, provide the following	receiving water information:	
must be ide 3-digit ID (e provide the	acility. Each outfall entified by a unique e.g., 001, 002). Also e latitude and n degrees decimal for all.	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:
Outfall 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		Pollutant(s) for which there is a TMDL:
Longitude		eliminated effective May 1, 2019.		N/A
Outfall ID	005 (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				N/A

Outfall ID	006 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID:
Lafifude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude				
If substantio	ally identical to other	outfall, list identical outfall ID: 005		
Ouffall 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				
lf aubalantie	I dentical to other	outfall, list identical outfall ID:		
II SUDSIGNIIC	any identical to office	oonali, iisi ideniicai oonali ib.	_	
Outfall ID	007 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall	Remove 00010 Temperature, water deg.	TMDL Name and ID:
dies h	007 (Sector O,	Sandia Canyon (Sigma	Temperature,	N/A  Pollutant(s) for which there is a TMDL:
Outfall ID	007 (Sector O,	Sandia Canyon (Sigma Canyon to NPDES outfall	Temperature, water deg. centrigrade from	N/A Pollutant(s) for which
Outfall ID Latitude Longitude	007 (Sector O, Subsector O1)	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	007 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Temperature, water deg. centrigrade from	N/A  Pollutant(s) for which there is a TMDL:
Outfall ID  Latitude  Longitude	007 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)  outfall, list identical outfall ID: 009  Sandia Canyon (Sigma Canyon to NPDES outfall	Temperature, water deg. centrigrade from list of impairments  Remove 00010 Temperature,	N/A  Pollutant(s) for which there is a TMDL:  N/A  TMDL Name and ID:

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				
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: N/A
Longitude				
If substantic	l ally identical to other o	l utfall, list identical outfall ID:	L	
7,53/12/11/19				
Outfall ID	011 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall	Remove 00010 Temperature, water deg.	TMDL Name and ID:
	011 (Sector O,	Sandia Canyon (Sigma	Temperature,	N/A  Pollutant(s) for which there is a TMDL:
Ouffall ID	011 (Sector O,	Sandia Canyon (Sigma Canyon to NPDES outfall	Temperature, water deg. centrigrade from	N/A Pollutant(s) for which
Outfall ID Latitude Longitude	011 (Sector O, Subsector O1)	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	011 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)  utfall, list identical outfall ID: 012  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	011 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)  utfall, list identical outfall ID: 012  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	013 (Sectors AA, F Subsectors AA1, F4)	Mortandad Canyon (Within LANL)	N/A
Latitude		Pamaya CIO 012 from narmit	Pollutant(s) for which there is a TMDL:
Longitude		Remove SIO 013 from permit coverage. Site achieved No Exposure Status effective December 18, 2018.	N/A
If substanti	ally identical to other o	u <mark>tfall,</mark> list identical outfall ID: 017	
Ouffall ID	014 (Sectors AA, F Subsectors AA1, F4)	Mortandad Canyon (Within LANL)	TMDL Name and ID: N/A
Latitude			Pollutant(s) for which there is a TMDL:
Longitude		Remove SIO 014 from permit coverage. Site achieved No Exposure Status effective December 18, 2018.	N/A
lf substanti	ally identical to other o	utfall, list identical outfall ID: 017	
	015 (Sectors AA, F	Mortandad Canyon (Within LANL)	TMDL Name and ID:
Outfall ID	Subsectors AA1, F4)	EANE)	IN/A
Ouffall ID			
		Remove SIO 015 from permit coverage. Site achieved No Exposure Status effective December 18, 2018.	Pollutant(s) for which
Latitude Longitude	Subsectors AA1, F4)	Remove SIO 015 from permit coverage. Site achieved No Exposure Status effective	Pollutant(s) for which there is a TMDL:
Latitude Longitude	Subsectors AA1, F4)	Remove SIO 015 from permit coverage. Site achieved No Exposure Status effective December 18, 2018.	Pollutant(s) for which there is a TMDL:
Latitude Longitude If <mark>substanti</mark>	Subsectors AA1, F4)  ally identical to other or  016 (Sectors AA, F	Remove SIO 015 from permit coverage. Site achieved No Exposure Status effective December 18, 2018.  Utfall, list identical outfall ID: 017  Sandia Canyon (Sigma Canyon to NPDES outfall	Pollutant(s) for which there is a TMDL: N/A TMDL Name and ID:

Outfall ID	019 (Sectors AA, F Subsectors AA1, F4)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)		N/A
Latitude				Pollutant(s) for which there is a TMDL:
Longitude		Remove SIO 019 from permit coverage. Site achieved No Exposure Status effective December 18, 2018.		N/A
If substanti	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)		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
				_
If substantio	ally identical to other o	utfall, list identical outfall ID:	_	
lf substantio	022 (Sectors AA, P, Subsectors AA1, P1)	Sandia Canyon (Sigma Canyon to NPDES outfall	Remove 00010 Temperature, water deg.	TMDL Name and ID:
7 242	022 (Sectors AA, P,	Sandia Canyon (Sigma	Temperature,	N/A  Pollutant(s) for which there is a TMDL:
Outfall ID	022 (Sectors AA, P,	Sandia Canyon (Sigma Canyon to NPDES outfall	Temperature, water deg. centrigrade from	N/A Pollutant(s) for which
Outfall ID  Latitude  Longitude	022 (Sectors AA, P, Subsectors AA1, P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)  Add Sector AA, Subsector AA1 to permit coverage for	Temperature, water deg. centrigrade from	N/A  Pollutant(s) for which there is a TMDL:
Outfall ID  Latitude  Longitude	022 (Sectors AA, P, Subsectors AA1, P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)  Add Sector AA, Subsector AA1 to permit coverage for monitored outfall 022.	Temperature, water deg. centrigrade from list of impairments  Remove 00010 Temperature, water deg.	N/A  Pollutant(s) for which there is a TMDL:
Outfall ID  Latitude  Longitude	022 (Sectors AA, P, Subsectors AA1, P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)  Add Sector AA, Subsector AA1 to permit coverage for monitored outfall 022.  Utfall, list identical outfall ID:  Sandia Canyon (Sigma Canyon to NPDES outfall	Temperature, water deg. centrigrade from list of impairments  Remove 00010 Temperature,	N/A  Pollutant(s) for which there is a TMDL: N/A  TMDL Name and ID:

Outfall ID	023 (Sector AA, P, Subsector AA1, P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	N/A
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 023.		N/A
lf <mark>substanti</mark>	ally identical to other o	utfall, list identical outfall ID: 022		
Outfall ID	024 (Sector AA, P, Subsector 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 SIO 024.		N/A
lf <mark>substanti</mark> d	ally identical 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>	ally identical to other o	uffall, list identical outfall ID: 022		
Ouffall ID	026 (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				
Longitude				N/A

027 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	N/A
		centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
ally identical to other	outfall, list identical outfall ID: 026		
028 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID: N/A
		centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
ally identical to other	outfall, list identical outfall ID: 026		
029 (Sector N, Subsector N2)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID:
		centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
lly identical to other	outfall, list identical outfall ID:		
032 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID:
		centrigrade from	
		list of impairments	Pollutant(s) for which there is a TMDL:
	(Sector P, Subsector P1)  O28 (Sector P, Subsector P1)  O29 (Sector N, Subsector N2)  O32 (Sector P, O32 (Secto	Canyon to NPDES outfall 001)  Canyon to NPDES outfall 001)  Canyon to NPDES outfall 1D: 026  Canyon to NPDES outfall 001)  Canyon to NPDES outfall 001)	Canyon to NPDES outfall   Temperature, water deg. centrigrade from list of impairments

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				
If substantio	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				
377127	I.			
If substantio	ally identical to other	outfall, list identical outfall ID: 032		
lf <mark>substantid</mark> Outfall ID	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	Temperature,	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	Temperature, water deg. centrigrade from	N/A  Pollutant(s) for which there is a TMDL:  N/A  TMDL Name and ID:
Outfall ID Latitude Longitude	035 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Temperature, water deg. centrigrade from	N/A  Pollutant(s) for which there is a TMDL:  N/A
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:  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,	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 substantio	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: N/A
Longitude				
If substantio	ally identical to other	outfall, list identical outfall ID:		
If substantio	038 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall		TMDL Name and ID:
	038 (Sector P,	Sandia Canyon (Sigma Canyon to NPDES outfall 001)		
Outfall ID	038 (Sector P,	Sandia Canyon (Sigma Canyon to NPDES outfall		N/A Pollutant(s) for which
Outfall ID  Latitude  Longitude	038 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)  Remove SIO 038 from permit coverage. Outfall was eliminated effective April 23,		N/A  Pollutant(s) for which there is a TMDL:
Outfall ID  Latitude  Longitude	038 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)  Remove SIO 038 from permit coverage. Outfall was eliminated effective April 23, 2019.		N/A  Pollutant(s) for which there is a TMDL:
Outfall ID  Latitude  Longitude  If substantic	038 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)  Remove SIO 038 from permit coverage. Outfall was eliminated effective April 23, 2019.  outfall, list identical outfall ID: 039  Sandia Canyon (Sigma Canyon to NPDES outfall		N/A  Pollutant(s) for which there is a TMDL:  N/A

Outfall ID	042 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	N/A
Latitude			centrigrade from list of impairments	Pollutant(s) for which there is a TMDL:
Longitude				
If substantio	I ally identical to other	outfall, list identical outfall ID:	1	
Outfall ID	041, 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	- 1			
If <mark>substantic</mark>	ally identical to other	outfall, list identical outfall ID: 042		
Ouffall ID	074 (Sector A, Subsector A4)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Remove 00010 Temperature, water deg.	TMDL Name and ID:
Ouffall ID Latitude	(Sector A,		With the second second second	N/A  Pollutant(s) for which there is a TMDL:
	(Sector A,	Canyon to NPDES outfall	Temperature, water deg. centrigrade from	N/A Pollutant(s) for which
Latitude Longitude	(Sector A, Subsector A4)	Canyon to NPDES outfall	Temperature, water deg. centrigrade from	N/A  Pollutant(s) for which there is a TMDL:
Latitude Longitude	(Sector A, Subsector A4)	Canyon to NPDES outfall 001)	Temperature, water deg. centrigrade from	N/A  Pollutant(s) for which there is a TMDL:
Latitude Longitude If substantic	(Sector A, Subsector A4)	outfall, list identical outfall ID:  Sandia Canyon (Sigma Canyon to NPDES outfall	Temperature, water deg. centrigrade from list of impairments  Remove 00010 Temperature,	N/A  Pollutant(s) for which there is a TMDL:  N/A  TMDL Name and ID:

Outfall ID	075 (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	I ally identical to other	outfall, list identical outfall ID:		
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: N/A
Latitude	35.8758507		dissolved [as Cu]; 39516 Polychlorinated	Pollutant(s) for which there is a TMDL:
Longitude	-106.327924	Add new monitored outfall 076 to permit coverage and NetDMR. Monitoring began June 1, 2019.	biphenyls [PCBs]	N/A
If substantic	ally identical to other	outfall, list identical outfall ID:		
Outfall ID				TMDL Name and ID:
		3.		
Latitude				Pollutant(s) for which there is a TMDL:
Longitude	ılly identical to other	outfall, list identical outfall ID:		
Longitude If substantia	ally identical to other	outfall, list identical outfall ID:		
Longitude If substantia Outfall ID	illy identical to other	outfall, list identical outfall ID:		there is a TMDL:
Longitude	ally identical to other	outfall, list identical outfall ID:		TMDL Name and ID:

4. Provide the following	Interne	dian cibai	it oner	nuttalli	atitude (	landitude	1.		-		_		_		
	2000			Contant	Gillous .			По	1						
Latitude/Longitude Dat						☐ GPS			her						
If you used a USGS I	opograp	shic map	, what	was the	scale?				_	_		_	_		-0
Harizontal Reference D		□ NA	-1-4		NAD 83			☐ WG5							
5. Does your facility disc	charge in	ilo a Mur	rcipal!	Separat	e Storm	Sewer Sy	stem (I	W24)\$ [	YES		NO				
If yes, provide the	name of	the MS4	opera	tor:							_		_		
	ality exce	eeds leve	els nece	essary to	ogque	rl propag								under its antidegradation policy as a Tier 2 d recreation in and on the water) or as a Tie	
☐ Tier 2/2,5. Provide the	e name (	s) of rece	aiving v	vater(s):							_				_
☐ Tier 3 (Outstanding N	vational I	Resource	Water	rs)*											
antidegradation purp 7. If you are subject to b	poses un benchma	der 40 CF	FR 131.	13(a)(3)										Ter 3 (outstanding national resource waters raness of your receiving water(s) (see Appe	
Total Casto Class Total	g/L) benchmo	ark monit	oring r	equirem	ents for	a hardne	ess-dep	pendent	meto	al, do	es y	our f	acili	lity discharge into any saltwater receiving v	vaters?
9. Does your facility disc	horne la	a feder	ol CER	CIAsite	listed in	Annend	iv PS	TVES	INC	7					
									200		Re	niono	ol Of	ffice determine that you are eligible for pe	rmit
coverage pursuar	nt to Parl	1.1.4.10*	S A	res 🗆	NO										
Office in advance an Part, the EPA Regions	nd the EP of Office	A Region may eva	nal Offici luate v	ce deter whether	rmines y you hav	rou are el re include	ligible ed ode	coverag	e uno	der th	his p	ermi pro	in ed	this permit unless you notify the EPA Region determining your eligibility for coverage ul lures to ensure that your discharges will not ance of a water quality standard.	nder this
F. Stormwater Pollutio	on Preve	ention Pi	lan (SI	WPPP) I	nforma	itlon									
1. Has the SWPPP been	prepare	d in adva	ance o	f filing th	nis NOI, c	as require	eds 🛘	YES [	INC	)	_				
2. SWPPP Contact Inform		EN ANIV		Transfer State	Walter or .	es a maria		dba.		1					
First Name, Middle Initia	I Last No	ame:	111	11	111	THE	11	11	1	11	1	11	1	HITTITE THE	
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Professional Title:					100				1.						
Phone:	Tital	TTT:	11	111	F	+ 11	1.1	l .							
Thomas L_I	111	111		بلط		" LL			~ T	Ü.,	-	, II.	ς.		
E-mail:								$\Pi \Pi$							
3, SWPPP Availability:															
Your current SWPPP or o			n from	your SW	PPP mus	st be man	de avo	allable th	roug	h one	e of	the I	olla	wing two options. Select one of the option	s and
	uired to	post any												defined in Appendix A) (such information mass.	ay be
Option 1: Maintain a	current	convols	YOUR SV	VPPP on	an Inter	mel naai	a // Iniv	areal Res	ource	a loc	cata	rorl	ID()		
Provide the web addres		CODY OF	Cui or	Hill Au	Gri in it.	Helber	z-Inca.	CIJUI NO.	ÇU(C)	D Luc	-015	01.	ne.		
Option 2: Provide the		ac inform	ation fo	rom vou	r SWPPP	in.									-
A. Describe your onsite i	industrial	activities					malen	al storag	e; eq	uipm	nent	luel	ng,	mainlenance, and cleaning; cutting steel	beams)
and potential spill an	d leak ar	eas:													

B. List the pollutant(s) or pollutant constituent(s) associated with each industrial activity exposed to stormwater that could be discharged in stormwater and an 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 any other measures taken to comply with the requirements in Part 2.2 Water Quality-Based Effluent Limitations (see Part 5.2.4):
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 5.2.5.7):
G. 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
<ul> <li>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.</li> <li>Provide a brief summary at 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):</li> </ul>
3. If you select criterion B, provide the NPDES ID from the other operator's NOI authorized under this permit:
1. 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:
Is submitted my completed Criterian 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.
114101111
Date your Criterian C Eliability Form was sent to EPA: 1 1 1 1 1 1 1 1 1 1
Date your Criterion C Eligibility Form was sent to EPA://
Date your Criterion C Eligibility Form was sent to EPA://  Describe any EPA-approved measures you will implement to ensure no likely adverse affects an listed species and critical habitat:

H. Historic	Preservation	on												
☐ YES	□ NO			ands, is your facility to aciated with the pro		operly of religi	ious or ci	ultural s	ignilica	ince to	an Ind	dian tri	beş	
2. Using th under the	ne instruction his permit (	ons in Appe only check	ndix Fol the MSGF 1 box)?	<sup>2</sup> , under which histori	ic properties pre	eservation crit	erion liste	ed in Pa	rt 1.1.4	.6 are y	you eli	gible li	or cover	oge
□ A	□в	ПС	□ D											
I. Certifica	ition Inform	atlon												
lo assure t system, or	hat qualifie those pers olete, I am	ed personne ons directly	el properly gathere responsible for ga	and all attachments of ed and evaluated the othering the information of penallies for subn	ne information st tion, the informa	ubmitted. Base ation submitted	ed on m d is, to th	y inquin e best	of the	person	n or pe	ersons o	who mo ef, true,	nage the accurate,
First Name	, Middle In	itial, Last No	me: Enrí	que		Tor	res			11	Ш		11	
Tille:	D	ivis	ion Lea	der	ШШ	ШШ	11							
Signature:		5	~2					Date	06	11	1/	20	19	
E-mail:	é	torr	es@lan	l lglolv	ШШ	1111	Ш							

# 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	
The second second		

											ired Waters Lim .4.900 NMAC [N						
Permit ID	Facility	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
NMR050013	Los Alamos National Laboratory	002	AA	AA1	002-11	11 Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable (as Al)	4=	1010 N	Aaximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/201
WMR050013	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	4=		Aaximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/201
NMR050013	Los-Alamos National Laboratory	002	AA	AA1	002-11	11 Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	40		Aaximum	mg/L	1/60	GF	4/1/2019	5/31/2019	7/31/201
NMR050013	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01090-1-0	Zinc, dissolved (as Zn)	4=		Aaximum	ug/L	1/60	Gf	4/1/2019	5/31/2019	7/31/201
NMR050013	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable (as Al)	4=	1010 N	Aaximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/201
NMR050013	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<b>4=</b>	1000 N	Aaximum	ug/L	1/60	GF	6/1/2019	7/31/2019	9/30/201
NMR050013	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	51450-1-0	Nitrite Plus Nitrate Total	<b>4=</b>	0.68 N	Aaximum	mg/L	1/60	Gŧ	6/1/2019	7/31/2019	9/30/201
NMR050013	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved (as Zn)	4=	99 M	Aaximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/201
NMR050013	Los Alamos National Laboratory	002	AA	AA1	002-11	11 Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	4=	1010 M	Aaximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/201
NMR050013	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<b>&lt;=</b>	1000 N	Aaximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/201
NMR050013	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<b>4=</b>	0.68 M	Aaximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	11/30/201
NMR050013	Los Alamos National Laboratory	002	AA	AA1	002-11	11 Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved (as Zn)	<b>4=</b>	99 M	Aaximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/201
WMR050013	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	4=	1010 M	Aaximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/202
VMR050013	Los Alamos National Laboratory	902	AA	AA1	002-11	11 Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<b>&lt;=</b>		Aaximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/202
NMR050013	Los Alamos National Laboratory	002	AA	AA1	002-11	11 Fabricated Metal Products, except Coating	51450-1-0	Nitrite Plus Nitrate Total	<b>4=</b>	39.53	Aaximum	mg/L	1/60	GF	10/1/2019	11/30/2019	1/31/202
NMR050013	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved (as-Zn)	4=	7.12	Aaximum	ug/L	1/60	Gř	10/1/2019	11/30/2019	1/31/202
NMR050013	Los Alamos National Laboratory	002	AA	AA1	002-IW	IW Impaired Water	01104 1 0	Aluminum, total recoverable las All	<b>4=</b>		Aaximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	002	AA	AA1	002-IW	IW-Impaired Water	01040 1 0	Copper, dissolved (as Cu)	4=		<del>laximum</del>	ug/L	1/YR	GF	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	002	AA	AA1	002-IW	IW Impaired Water	3951610	Polychlorinated biphenyls [PCBs]	4=	0.2 M	Aaximum	ug/L	1/YR	Gř	4/1/2019	11/30/2019	1/31/2020
VMR050013	Los Alamos National Laboratory	002	AA	AA1	002-fW/	IW Impaired Water	00010-1-0	Temperature, water-deg. centigrade	<b>4=</b>		Aaximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
								0			100000000000000000000000000000000000000				11,41,115.12	24/20/2022	2/02/202
NMR050013	Los Alamos National Laboratory	005	0	01	005-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000 M	laximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
NMR050013	Los Alamos National Laboratory	005	0	01		O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=		/aximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013	Los Alamos National Laboratory	005	0	01	005-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=		1aximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
VMR050013	Los Alamos National Laboratory	005	0	01	005-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=		1aximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
VMR050013	Los Alamos National Laboratory	005	0	01	005-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=		1aximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
VMR050013	Los Alamos National Laboratory	005	0	01	005-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		laximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
VMR050013	Los Alamos National Laboratory	005	0	01	005-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls (PCBs)	<=	7 10 10 10	laximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
VMR050013	Los Alamos National Laboratory	005	0	01	005 IW	IW-Impaired Water	00010-1-0	Temperature, water deg. centigrade	4=		laximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
											72-101114-111		14.50	_	26.47.44.25		2/22/232
VMR050013	Los Alamos National Laboratory	009	0	01	009-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000 M	laximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
VMR050013	Los Alamos National Laboratory	009	0	01	009-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=		faximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
VMR050013	Los Alamos National Laboratory	009	0	01	009-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=		laximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
	Los Alamos National Laboratory	009	0	01		O1 - Steam Electric Generating Facilities		Iron, total [as Fe]	<=	1000 M	CD DOUGLE DO	ug/L		Gr	10/1/2019	11/30/2019	1/31/2020
	Los Alamos National Laboratory	009	0	01	009-IW	IW - Impaired Water		Aluminum, total recoverable [as Al]	<=		1aximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
THE STREET	Los Alamos National Laboratory	009	0	01	009-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		laximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
	Los Alamos National Laboratory	009	0	01	009-IW	IW - Impaired Water	3951610	Polychlorinated biphenyls [PCBs]	<=		laximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
VMR050013	Los Alamos National Laboratory	009	0	01	009 IW	IW Impaired Water	00010 1 0	Temperature, water deg. centigrade	45		laximum	deg€		Gr	4/1/2019	11/30/2019	1/31/2020
													F A. H				
VMR050013	Los Alamos National Laboratory	012	0	01	012-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000 M	laximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
NMR050013	Los Alamos National Laboratory	012	0	01		O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000 M		ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
VMR050013	Los Alamos National Laboratory	012	0	01	012-01	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000 M	20.27 At 1 At 2 At 1	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
VMR050013	Los Alamos National Laboratory	012	0	01	012-01	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	1/31/2020
NMR050013	Los Alamos National Laboratory	012	0	01	012-IW	IW - Impaired Water	0110410	Aluminum, total recoverable [as Al]	<=	1010 M		ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	012	0	01	012-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		laximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	012	0	01	012-IW	IW - Impaired Water	3951610	Polychlorinated biphenyls [PCBs]	<=	10.00	laximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
VMR050013	Los Alamos National Laboratory	012	9	01	012-IW	IW-Impaired Water	00010-1-0	Temperature, water deg. centigrade	<b>4=</b>		laximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
															- 19 1		
VMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11-Fabricated Metal Products, except Coating	0110410	Aluminum, total recoverable [as Al]	<b>&lt;=</b>	1010 M	laximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
VMR050013	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>		laximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
VMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	4=	1000 M	DE 2 (10 ) ( PO) ( 10 )	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
VMR050013	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=		laximum	mg/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
VMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11 Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	4=		laximum	ug/L	1/60	GF	4/1/2019	5/31/2019	7/31/2019
VMR050013	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]	4=	1010 M		ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
VMR050013	Los Alamos National Laboratory	017	AA, F	AA1, F4		11 Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as Cu]	<b>4</b> =		laximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019

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Facility	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
amos National Laboratory	017	AA, F	AA1, F4	017-11	11 Fabricated Metal Products, except Coating	01045-1-0	Iron, total (as Fe)	4=	1000	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/20
amos 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	GF	6/1/2019	7/31/2019	9/30/20
amos National Laboratory	017	AA, F	AA1, F4	017-11	11-Fabricated Metal Products, except Coating	01090-1-0	Zinc, dissolved (as Zn)	4=	99 1	Maximum	ug/L	1/60	GF	6/1/2019	7/31/2019	9/30/20
amos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable (as Al)	4=		Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/20
amos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01040-1-0	Copper, dissolved (as Cu)	4=	7.4	Maximum	ug/L	1/60	GF	8/1/2019	9/30/2019	11/30/20
amos National Laboratory	017	AA, F	AA1, F4	017-11	11 Fabricated Metal Products, except Coating	01045-1-0	Iron, total (as Fe)	4=	1000	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/20
THE RESIDENCE OF SHIP PROPERTY AND ADDRESS OF THE PARTY AND ADDRESS OF	017	AA, F	AA1, F4	017-11	11 Fabricated Metal Products, except Coating	51450-1-0	Nitrite Plus Nitrate Total	4=	-	Maximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	11/30/20
amos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved (as Zn)	4=		Waximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/20
amos 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>		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/20
amos National Laboratory		AA, F	AA1, F4	017-11	11 Fabricated Metal Products, except Coating	01040-1-0	Copper, dissolved (as Cu)	40		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/20
amos National Laboratory	017	-	AA1, F4	017-11	11 Fabricated Metal Products, except Coating	01045-1-0	Iron, total las Fel	4=		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/20
amos National Laboratory	017	AA, F		017-11	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	1/31/20
amos National Laboratory	017	AA, F	AA1, F4	017-11	11 Fabricated Metal Products, except Coating	01090-1-0	Zinc, dissolved (as Zn)	4=	-	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/20
amos National Laboratory	017	AA, F	AA1, F4		IW Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	4=		<del>Vaximum</del> Vaximum	ug/t	1/YR	Gr	4/1/2019	11/30/2019	1/31/20
amos National Laboratory	017	AA, F	AA1, F4	017-IW	IW Impaired Water	01040 1 0	Copper, dissolved las Cul	4=		<del>Vaximum</del> Maximum	ug/t	1/YR	Gr	4/1/2019	11/30/2019	1/31/20
amos National Laboratory	017	AA, F	AA1, F4	017 IW		39516 1 0						1/YR	Gr	4/1/2019	11/30/2019	1/31/20
amos National Laboratory	017	AA, F	AA1, F4	017-IW	IW Impaired Water	17.5	Polychlorinated biphenyls [PCBs]	<b>4=</b>		Maximum	ug/L	-	_			1/31/20
amos National Laboratory	017	AA, F	AA1, F4	017-IW	IW Impaired Water	00010-1-0	Temperature, water deg. centigrade	40	24 1	Waximum	deg-C	1/YR	Gr	4/1/2019	11/30/2019	1/31/20
			100000	2000	The second secon	0110110	ALCOHOLOGICA AND CONTRACTOR AND CONT		1010	i de contraction de la contrac	100	1/00	<b>*</b>	1/1/2010	r /24 /2040	7/24/20
amos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	4=		<del>Vaximum</del>	ug/L	1/60	Gf	4/1/2019	5/31/2019	7/31/20
amos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved (as Cu)	44		<del>Vaximum</del>	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/20
amos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	01045-1-0	Iron, total [as Fe]	4=		Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/20
amos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	€=		Maximum	mg/L	1/60	Gf	4/1/2019	5/31/2019	7/31/20
amos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01090-1-0	Zinc, dissolved [as Zn]	40		mumixeN	UB/L	1/60	GF	4/1/2019	5/31/2019	7/31/20
amos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	4=		Maximum	ug/L	1/60	Gf	6/1/2019	7/31/2019	9/30/20
amos 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> =		<del>Vaximum</del>	ug/L	1/60	Gf	6/1/2019	7/31/2019	9/30/20
amos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	4=		Waximum	ug/L	1/60	GF	6/1/2019	7/31/2019	9/30/20
amos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	51450 1-0	Nitrite Plus Nitrate Total	4=	4 83.0	Maximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/20
amos National Laboratory	929	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved (as Zn)	<b>&lt;=</b>	99 4	Vaximum	ug/L	1/60	GF	6/1/2019	7/31/2019	9/30/20
ames 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 A	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/20
amos 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 4	Vlaximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/20
amos 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 A	Maximum	ug/L	1/60	GF	8/1/2019	9/30/2019	11/30/20
lamos National Laboratory	020	AA, F	AA1, F4	020-11	11 - Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	4=	0.68	<del>Vaximum</del>	mg/L	1/60	Gr	8/1/2019	9/30/2019	11/30/20
lamos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	4=	4 66	<del>Vaximum</del>	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/20
lamos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable (as Al)	<b>&lt;=</b>	1010 A	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/20
lamos 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 A	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/20
lamos National Laboratory	020	AA, F	AA1, F4	020-11	11 Fabricated Metal Products, except Coating	01045-1-0	iron, total (as Fe)	4=	1000 A	Maximum	ug/L	1/60	Gf	10/1/2019	11/30/2019	1/31/203
lamos 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 A	Vaximum	mg/L	1/60	GF	10/1/2019	11/30/2019	1/31/202
lamos 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>	4 99	Maximum	ug/L	1/60	GF	10/1/2019	11/30/2019	1/31/207
lamos National Laboratory	020	AA, F	AA1, F4	020-IW	IW—Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<b>&lt;=</b>	1010 A	Maximum	ug/L	1/YR	GF	4/1/2019	11/30/2019	1/31/202
lamos National Laboratory	020	AA, F	AA1, F4	020 IW	IW Impaired Water	01040 1 0	Copper, dissolved (as Cu)	4=		Vlaximum	ug/L	1/YR	GF	4/1/2019	11/30/2019	1/31/20
lamos National Laboratory	020	AA, F	AA1, F4	020 IW	IW-Impaired Water	39516-1-0	Polychlorinated biphenyls [PCBs]	4=	0.2 A	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/202
lamos National Laboratory	020	AA, F	AA1, F4	020-IW	IW Impaired Water	00010-1-0	Temperature, water-deg. centigrade	<b>4=</b>	24 4	Maximum	deg-€	1/YR	Gr	4/1/2019	11/30/2019	1/31/200
idinos ivational tabolistory	OZU	70.9.1	(4.12)13							144-104-114		TIT FEE				
Iswaa National Laboratory	022	AA	AA1	022-11	11- Fabricated Metal Products, except Coating	0110410	Aluminum, total recoverable [as Al]	<=	1010 N	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/20:
lamos 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	4/1/2019	5/31/2019	7/31/20
lamos National Laboratory		AA	AA1	022-11	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	7/31/20
lamos National Laboratory	022		AA1	022-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=		Vlaximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/20
lamos National Laboratory	022	AA	AA1	022-11	11- Fabricated Metal Products, except Coating	0110410	Aluminum, total recoverable [as Al]	<=		Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/20
lamos National Laboratory	022	AA	_	022-11	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	9/30/20
lamos National Laboratory	022	AA	AA1	-	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	9/30/20
lamos National Laboratory	022	AA	AA1	022-11		01090 1 0	Zinc, dissolved [as Zn]	<=					Gr	6/1/2019	7/31/2019	9/30/20
lamos National Laboratory		-				10 20 20 20 20 20 20 20 20 20 20 20 20 20					_					11/30/20
lamos National Laboratory	-	_	-							30.00						11/30/20:
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lamos National Laboratory	022	-	-					-								11/30/20:
lamos National I lamos National I	Laboratory Laboratory Laboratory	Laboratory 022 Laboratory 022 Laboratory 022	Laboratory 022 AA Laboratory 022 AA Laboratory 022 AA	Laboratory 022 AA AA1 Laboratory 022 AA AA1 Laboratory 022 AA AA1	Laboratory         022         AA         AA1         022-11	Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 11- Fabricated Metal Products, except Coating 11- Fabricated Metal Products except Coating 11- Fabricated Metal	AA	Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 01104 1 0 Aluminum, total recoverable [as Al] Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 01045 1 0 Iron, total [as Fe] Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total	Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 01104 1 0 Aluminum, total recoverable [as Al] <= Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 01045 1 0 Iron, total [as Fe] <= Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total <= Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total <=	Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 01104 1 0 Aluminum, total recoverable [as Al] <= 1010 P.  Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 01045 1 0 Iron, total [as Fe] <= 1000 P.  Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total <= 0.68 P.  Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total <= 0.68 P.  Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total <= 0.68 P.  Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total <= 0.68 P.  Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total <= 0.68 P.  Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total <= 0.68 P.  Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total <= 0.68 P.  Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total <= 0.68 P.  Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total <= 0.68 P.  Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total <= 0.68 P.  Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total <= 0.68 P.  Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products (Except Coating 51450 1 0 Nitrite Plus Nitrate Total	Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 01104 1 0 Aluminum, total recoverable [as Al] <= 1010 Maximum  Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 01045 1 0 Iron, total [as Fe] <= 1000 Maximum  Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total <= 0.68 Maximum  Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total <= 0.68 Maximum	Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 01104 1 0 Aluminum, total recoverable [as AI] <= 1010 Maximum ug/L aboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 01045 1 0 Iron, total [as Fe] <= 1000 Maximum ug/L ug/L aboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 51450 1 0 Nitrite Plus Nitrate Total <= 0.68 Maximum mg/L ug/L ug/L ug/L ug/L ug/L ug/L ug/L u	Laboratory 022 AA AA1 022-11 11-Fabricated Metal Products, except Coating 01104 1 0 Aluminum, total recoverable [as AI] <= 1010 Maximum ug/L 1/60 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 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 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	Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 01104 1 0 Aluminum, total recoverable [as AI] <= 1010 Maximum ug/L 1/60 Gr 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 Laboratory 022 AA AA1 022-11 11- Fabricated Metal Products, except Coating 01045 1 0 Nitrite Plus Nitrate Total <= 0.68 Maximum mg/L 1/60 Gr	Laboratory         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         8/1/2019           Laboratory         022         AA         AA1         022-11         11- Fabricated Metal Products, except Coating         01045 1 0 Iron, total [as Fe]         <=	Laboratory         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         8/1/2019         9/30/2019           Laboratory         022         AA         AA1         022-11         11- Fabricated Metal Products, except Coating         01045 1 0 Iron, total [as Fe]         <=

											paired Waters Lin 6.4.900 NMAC [N	The section of					
Permit ID	Facility	Permitted Feature	Sector(s)	Subsector	Consolidated Discharge # (Limit Set)	Discharge Description	Parameter Code	Parameter Name	Symbol	Quality Value	Limit Type	Units	Freq. of	2000	Monitoring Period Start Date	Monitoring Period End Date	DMR Due Date
NMR050013	Los Alamos National Laboratory	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	10/1/2019	11/30/2019	1/31/2020
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	10/1/2019		1/31/2020
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	10/1/2019		1/31/2020
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	10/1/2019		
NMR050013	Los Alamos National Laboratory	022	Р	P1	022-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	022	P	P1	022-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 Alamos National Laboratory	022	P	P1	022-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	Los Alamos National Laboratory	022	Þ	P1	022-IW	IW Impaired Water	00010-1-0	Temperature, water deg. centigrade	4=	24	Maximum	deg €	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	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	Р	P1	026-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 Alamos National Laboratory	026	Р	P1	026-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	Los Alamos National Laboratory	026	P	P1	026 IW	IW Impaired Water	00010 1 0	Temperature, water deg. centigrade	4=	24	Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
										1100						1 = = = = =	
NMR050013	Los Alamos National Laboratory	029	N	N2	029-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as AI]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	029	N	N2	029-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 Alamos National Laboratory	029	N	N2	029-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	Los Alamos National Laboratory	029	N	N2	029 IW	IW Impaired Water	00010 1 0	Temperature, water deg. centigrade	4=	24	Maximum	deg C	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	51931 1 0	Adjusted Gross Alpha	<=		Maximum	pCi/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	031	Р	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	031	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]	<=	0.2	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	032	Р	P1	032-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	032	р	P1	032-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 Alamos National Laboratory	032	р	P1	032-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	Los Alamos National Laboratory	032	Þ	P1	032 IW	IW Impaired Water	00010-1-0	Temperature, water deg. centigrade	4=	24	Maximum	deg C	1/YR	Gf	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	036	р	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	036	Đ	P1	036-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<b>4=</b>	7	Maximum	ug/L	1/YR	GF	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	036	Þ	P1	036 IW	IW Impaired Water	39516-1-0	Polychlorinated biphenyls [PCBs]	<b>&lt;=</b>	0.2	Maximum	ug/L	1/YR	Gf	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	036	b	P1	036-IW	IW—Impaired Water	00010 1 0	Temperature, water deg. centigrade	<b>&lt;=</b>	24	Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	037	р	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
NMR050013	Los Alamos National Laboratory	037	P	P1	037-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 Alamos National Laboratory	037	Р	P1	037-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	Los Alamos National Laboratory	039	р	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
NMR050013	Los Alamos National Laboratory	039	Р	P1	039-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 Alamos National Laboratory	039	Р	P1	039-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	Los Alamos National Laboratory	039	P	P1	039-IW	IW Impaired Water	00010-1-0	Temperature, water deg. centigrade	<b>&lt;=</b>	24	Maximum	deg-C	1/YR	GF	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	042	P	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	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	042	p.	P1	042-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	Los Alamos National Laboratory	042	р	P1	042-IW	IW—Impaired-Water	00010-1-0	Temperature, water deg. centigrade	<b>4</b> =	24	Maximum	deg-C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	043	D	D1	043-D1	D1 - Asphalt Paving and Roofing Materials and Lubricant Manufacturing	00530 1 0	Solids, total suspended	<=	100	Maximum	mg/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
NMR050013	Los Alamos National Laboratory	043	D	D1	043-D1	D1 - Asphalt Paving and Roofing Materials and Lubricant Manufacturing	00530 1 0	Solids, total suspended	<b>&lt;=</b>	100	Maximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
	assertation in the state of the		11.0	11 120 1	+	D1 - Asphalt Paving and Roofing Materials and						1	( = 1	Lbl			To series s
NIMPOSOO13	Los Alamos National Laboratory	043	D	D1	043-D1	Lubricant Manufacturing	00530 1 0	Solids, total suspended	<=	100	Maximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019

											6.4.900 NMAC [N						
Permit ID	Facility	Permitted Feature	Sector(s)	Subsector	Consolidated Discharge # (Limit Set)	Discharge Description	Parameter Code	Parameter Name	Symbol	Quality Value	Limit Type	Units		12.22	Monitoring Period Start Date	Monitoring Period End Date	DMR Due
, cimic io		1	1			D1 - Asphalt Paving and Roofing Materials and			1			17.7				F. 70 M.	
VMR050013	Los Alamos National Laboratory	043	D	D1	043-D1	Lubricant Manufacturing	00530 1 0	Solids, total suspended	<=	100	Maximum	mg/L	1/60	Gr	10/1/2019	11/30/2019	1/31/202
						1D - Asphalt Paving and Roofing Materials and					4 4					7 7	7000
NMR050013	Los Alamos National Laboratory	043	D	D1	043-1D	Lubricant Manufacturing	00556 1 0	Oil & Grease	<=	10	30-Day Average	mg/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/202
				9 / .	T. W	1D - Asphalt Paving and Roofing Materials and					The second	HLES	75.7	100			Service .
NMR050013	Los Alamos National Laboratory	043	D	D1	043-1D	Lubricant Manufacturing	00556 1 0	Oil & Grease	<=	15	Dally Maximum	mg/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/202
				1 500	06/2/5	1D – Asphalt Paving and Roofing Materials and	Section 19	3.	1000			15.0	A5.60	6.3	A 40 00 to 1.4	San	Saw Saw Sa
NMR050013	Los Alamos National Laboratory	043	D	D1	043-1D	Lubricant Manufacturing	00400 1 0	PH	>=	6	Minimum	SU	1/YR	Gr	4/1/2019	11/30/2019	1/31/202
	The second of the second of the second	1.3.5		54	252.52	1D - Asphalt Paving and Roofing Materials and	204204.0	100	1000			600	4.00	- 2	4 (1) (2004.0	44 /20 /2042	a Ina Iana
NMR050013	Los Alamos National Laboratory	043	D	D1	043-1D	Lubricant Manufacturing	00400 1 0	PH	<=	9	Maximum	SU	1/YR	Gr	4/1/2019	11/30/2019	1/31/202
					047.40	1D - Asphalt Paving and Roofing Materials and	00530 1 0	Callide total auranadad		15	20 Day Average		1700	· ·	n/1/2010	27/20/2020	1/21/202
NMR050013	Los Alamos National Laboratory	043	D	D1	043-1D	Lubricant Manufacturing  1D - Asphalt Paving and Roofing Materials and	00530 1 0	Solids, total suspended	<=	15	30-Day Average	mg/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/202
	Correct Research of Caledon	040		D1	042.10	[100] [120]	00530 1 0	Solids, total suspended	<=	22	Dally Maximum	mali	1/YR	Gr	4/1/2010	11/30/2019	1/31/202
NMR050013	Los Alamos National Laboratory	043	D	D1	043-1D 043-IW	Lubricant Manufacturing IW - Impaired Water	51931 1 0	Adjusted Gross Alpha	<= <=	-	Maximum	mg/L pCi/L	1/YR	Gr	4/1/2019 4/1/2019	11/30/2019	1/31/202
NMR050013	Los Alamos National Laboratory	043	D	D1 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	1/31/202
NMR050013	Los Alamos National Laboratory	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	1/31/202
NMR050013	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	4/1/2019	11/30/2019	1/31/202
NMR050013	Los Alamos National Laboratory	043		- DI	043-100	TW Impanca Water	1130010	rectairy, total points		0.77	Widalitiditi	- UB/ L	2/115	- 51	4/1/2015	11/50/2015	2/31/202
NMR050013	Los Alamos National Laboratory	074	A	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	7/31/201
NMR050013	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	Gr	4/1/2019	5/31/2019	7/31/201
NMR050013	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	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013	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	Gr	6/1/2019	7/31/2019	9/30/2019
NMR050013	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	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013	Los Alamos National Laboratory	074	A	A4	074-A4	A4 - Hardwood Dimension and Flooring Mills	00530 1 0	Solids, total suspended	<=	100	Maximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
NMR050013	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	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	074	A	A4	074-A4	A4 - Hardwood Dimension and Flooring Mills	00530 1 0	Solids, total suspended	<=	100	Maximum	mg/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	074	A	A4	074-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	074	A	A4	074-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 Alamos National Laboratory	074	A	A4	074-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	Los Alamos National Laboratory	074	A	A4	074-IW	IW Impaired Water	00010 1 0	Temperature, water deg. centigrade	4=	24	Maximum	deg€	1/YR	Gf	4/1/2019	11/30/2019	1/31/2020
			THE RES	2 4			114			1							
NMR050013	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	Gr	4/1/2019	11/30/2019	1/31/2020
NMR050013	Los Alamos National Laboratory	075	P	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 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		1/31/2020
NMR050013	Los Alamos National Laboratory	075	P	P1	075-IW	IW - 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
NMR050013	Los 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
NMR050013	Los 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	4/1/2020	5/31/2020	7/31/2020
NMR050013		076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=		Maximum	mg/L	1/60	Gr	4/1/2020	5/31/2020	7/31/2020
NMR050013	Los 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	4/1/2020	5/31/2020	7/31/2020
NMR050013	Los 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
	Los 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	6/1/2019	7/31/2019	9/30/2019
	Los 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
NMR050013		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
	Los Alamos National Laboratory	076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	0110410	Aluminum, total recoverable [as Al]	<=		Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
	Los 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	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
	Los Alamos National Laboratory	076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating 11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<= <=		Maximum Maximum	mg/L	1/60	Gr	8/1/2019 8/1/2019	9/30/2019 9/30/2019	11/30/2019
NMR050013	Los Alamos National Laboratory	076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	0110410	Aluminum, total recoverable [as Al]	<= <=		Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
NMR050013		076	AA	AA1	076-11	11- Fabricated Metal Products, except Coating	0110410	Iron, total [as Fe]	<= <=		Maximum	ug/L	1/60	Gr Gr	10/1/2019		1/31/2020
NMR050013		076	AA	AA1	076-11 076-11	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
NMR050013		076	AA	AA1	076-11	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		076	AA	AA1	076-II	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	-	Maximum	ug/L	1/YR	Gr	4/1/2019		1/31/2020
MINIKO20013	Los Alamos National Laboratory  Los Alamos National Laboratory	076	AA	AA1	076-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=		Maximum	ug/L	1/YR	Gr		11/30/2019	1/31/2020

												and Impaired Waters Limits per MSGP Section 9.6.2 and ards (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	Parameter Name	Symbol	Quality Value	Limit Type	Units	Freq, of	1000	Control of the Contro	Monitoring Period End Date	DMR Due Date		
	Los Alamos National Laboratory	076	AA	AA1		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	NOI and NetDMR are in BOLD.																		
Deletions from	n NOI and NetDMR are indicated by	strikethrough	t																
Regular text i	ndicates no change to NOI or NetDM	R.																	

# **ATTACHMENT 2: SWPPP AMENDMENTS**

Date	Plan Section	Reason for Amendment	Amendment
Jan	All	New MSGP Plan for new	New MSGP Plan for Triad,
2019		Laboratory Contract	LLC (replacing LANS LLC)
Jan 2020	All	Implementation of the new SWPPP template as required by EPC-CP-QP-2110, MSGP Stormwater Pollution Prevention Plan Preparation and Maintenance. Also included all inspections, assessments and reports required for the yearly	Inserted new template language to standardize all MSGP SWPPPs and inserted all required documentation for the yearly revision.
Jan	All	update.  To include all inspections,	Insert all required
2021	7.00	assessments, and reports required for yearly update.	documentation for the yearly revision.

# ATTACHMENT 3: CERTIFICATION OF NO UNAUTHORIZED STORMWATER DISCHARGES

NON-STORM WATER DISCHARGE

ASSESSMENT AND CERTIFICATION

Completed by: Leonard F. Sandoval

Title: Deployed Environmental Professional

Date: 1/15/2019

Date of Evaluation	Outfall Directly Observed During Test (Location)	Identify Potential Significant Sources of Non-Storm Water	Method Used to Test or Evaluate Discharge	Is Non-Storm Water Present?	How Often?	Describe Results from Test for Presence of Non-Storm Water Discharge
1/15/2019	Outfall 60-MRF-1 ID # 029	None	Visual evaluation of Outfall at concrete retention pond	No	NA	None

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 gather and evaluate 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 completed. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name &

Name & Official Title: Russell Hore GL DESH-UTS

Signature: Respect to the State of the State of

Date Signed: 1/15/2019

# 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, ESHOSS, 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

### DMR Copy of Record

Permit																							
Permit	#:	NMR050	0013		Permitt	ee:		TRIAD NATIONAL SECURITY LLC				Facility	y:		LOS AL	LOS ALAMOS NATIONAL LABORATORY							
Major:		No			Permitt	ee Address			OX 1663 N LAMOS,						Facility Location:			PO BOX 1663 LOS ALAMOS, NM 87545					
Permit		029 External	l Outfall		Discharge:			029-IW Impaired Water					•										
Report	Dates & Status																						
		From 12	2/01/18 to 11/30/1	19	DMR Due Date:			01/31/	20					Status	:		NetDMF	l Valid	dated				
	derations for Form C																						
	based upon the altern			April 1 thro	ough Nove	mber 30.																	
Princip	oal Executive Officer																						
First N	ame:				Title:									Teleph	one:								
Last N	ame:													•									
No Da	ta Indicator (NODI)																						
Form I	NODI:																						
	Parameter		Monitoring Location	Season # P	Param. NODI				ty or Loadir	_						centratio				of Ex.	Frequency of A	nalysis	Sample Type
Code	Name						Qualifier 1	Value 1	Qualifier 2	Value 2	Units Qu	alifier 1 Valu	ue 1 Qu	ualifier 2 Va	lue 2 Qu		Value 3		nits				
<b>Y</b> 04046	Copper, dissolved [as Cu	1 1	1 - Effluent Gross	0	-	Sample Permit Reg.									<=		41.8 7.0 MAXIMUM		ug/L ug/L 1		01/YR - Annual 01/YR - Annual		GR - GRAB GR - GRAB
<b>1</b> 01040	Coppor, alcoorvou (ac ou	,	- Lindon Grood			Value NODI									-		7.0 MJ UMINIOM		ug/L I	Ì	on the familia		OIL OILLE
						Sample											816.0	28 -	ug/L	(	01/YR - Annual		GR - GRAB
01104	Aluminum, total recoverab	ble 1	1 - Effluent Gross	0	=	Permit Req.									<=		1010.0 MAXIMU	M 28 -	ug/L 0	(	01/YR - Annual		GR - GRAB
						Value NODI Sample									<		0.0351	28 -	ug/L	(	01/YR - Annual		GR - GRAB
39516	Polychlorinated biphenyls	[PCBs] 1	1 - Effluent Gross	0		Permit Req.									<=		0.2 MAXIMUM	_	ug/L 0		01/YR - Annual		GR - GRAB
						Value NODI																	
	ssion Note			0 1	F	<b>-</b> " "								11.76								_	
	ameter row does not o	contain a	any values for the	Sample no	or Emuent	rading, the	en none o	t the to	llowing fle	ias Will	be subr	nitted for t	nat rov	w: Units, i	Numbe	r of Exc	cursions, Freq	uency	of Ana	aiysis.	, and Sample	Type.	
East C	heck Errors																						
	Parameter		Monitori	ng Locatior	n		Field	d			Туре			Description								Acknowledge	
Code	Name		Monitori	ng Location		Field					Type			Description						Acknowled			omicage
01040	Copper, dissolved [a	ıs Cu]	1 - Effluent G	Fross	Quali	ity or Concen	tration Sar	mple Va	lue 3		Soft	The provi	provided sample value is outside the permit limit						de: 1)			`	Yes
Comm	ents																						
	-19-32659. The impair			ceeded the	New Mexi	ico Water Q	uality Sta	ndard.	The impai	red wa	ter pollu	tant total A	Aroclo	r was not	detecte	ed in sto	ormwater disc	harge	from th	his ou	ıtfall therefore	annua	I
Attach	ments																						
No attach																							
Report	Last Saved By																						
TRIAD	NATIONAL SECURI	TY LLC																					
User:			les	lie@lanl.go	V																		
Name:				slie Dale																			
E-Mail:				lie@lanl.go																			
Date/T			202	20-01-09 0	9:00 (Tin	ne Zone: -06	6:00)																
Report	Last Signed By																						
User:				RRILLLEM																			
Name:			Tei	rrill Lemk	е																		
E-Mail:			tler	mke@lanl.g	gov																		
Date/T	me:		202	20-01-09 1	3:29 (Tin	ne Zone: -06	6:00)																

### DMR Copy of Record

Date/Time:

Permit																					
Permit #:	I	NMR050013			Perm	ttee:		TF	RIAD NATIO	DNAL SE	CURITY	LLC		Faci	ility:		LOS ALAMOS NA	TIONAL	L LABC	RATORY	
Major:	I	No			Perm	Permittee Address:			PO BOX 1663 MS K490 LOS ALAMOS, NM 87545					Faci	Facility Location: PO BOX 1663 LOS ALAMOS, NM			M 87545	5		
Permitted		)29 External Outf	all		Disch	arge:			029-IW Impaired Water												
Report D	ates & Status																				
Monitoring Period: From 12/01/19 to 11/30/20				DMR	Due Date:		01	/31/21					Stati	Status: NetDMR Validated			d				
	ations for Form Comp	letion			ļ																
	sed upon the alternate		eason of April 1 th	rough I	November 3	).															
	Executive Officer	J	·	J																	
First Nan					Title:									Tele	phone:						
Last Nam	ie:														•						
	Indicator (NODI)																				
Form NO		<u>-</u>																			
	Parameter		Monitoring Locat	on Seas	on # Param. N	ODI		Quant	ity or Loadin	g				Qua	ality or C	oncentration			# of Ex	. Frequency of Ana	alysis Sample Type
Code	Name							r 1 Value	1 Qualifier 2	Value 2 Ur	nits Qualifie	er 1 Value 1	Qualifier 2 V	alue 2 Qua			Value 3	Units			
						Samp Permit F								<=		2.3 0 MAXIMUM		28 - ug/l 28 - ug/l		01/YR - Annual 01/YR - Annual	GR - GRAB GR - GRAB
X 01040	Copper, dissolved [as	Cu]	1 - Effluent Gros	s 0		Value N									/.	O IVIAXIIVIOIVI		20 - ug/i	_ 1	O I/ TIX - Allifual	GIV-GIVAD
						Samp									92	9.8		28 - ug/l		01/YR - Annual	GR - GRAB
01104	Aluminum, total recov	erable	1 - Effluent Gros	s 0		Permit F								<=		010.0 MAXIMUM		28 - ug/l		01/YR - Annual	GR - GRAB
01104	,,		1 Emach Groc	5 0		Value N	ODI														
						Samp	le														
39516	Polychlorinated biphe	nyls [PCBs]	1 - Effluent Gros	s 0		Permit F	Req.							<=	0.	2 MAXIMUM		28 - ug/l	L	01/YR - Annual	GR - GRAB
						Value N	ODI								E	B - Below Detec	ction Limit/No Detection				
Submiss	ion Note																				
If a param	eter row does not conta	ain any value	s for the Sample	nor Effl	luent Trading	, then none	e of the follo	owing fie	elds will be s	submitted	d for that r	row: Units	s, Number o	f Excursion	ons, Fre	quency of An	alysis, and Sample Typ	oe.			
Edit Ched	ck Errors																				
	Parameter																				
Code	Name	Monito	oring Location		F	eld		Туре	уре					Description							Acknowledge
		4 500		- II.	0 ,			0 (						ermit limit. Please verify that the value you have provided is correct. (Error Code: 1)							V
	Copper, dissolved [as Cu]	1 - Efflue	nt Gross	Juality o	or Concentrati	on Sample v	alue 3	Soft	The provid	ed sampi	e value is d	outside the	e permit limit.	. Please ve	erity that	the value you r	ave provided is correct.	(Error Co	ode: 1)		Yes
Commen																					
LA-UR-20	-30425. The impaired v	ater pollutar	nt Cu exceeded th	e New	Mexico Wat	er Quality S	Standard.														
Attachme																					
No attachme	ast Saved By																				
	ATIONAL SECURITY L	1.0																			
	ATIONAL SECURITY L	LC	loglid	Manl A	aov.																
User: leslie@lanl.gov Name: Leslie Dale																					
E-Mail: leslie@lanl.gov  Date/Time: 2020-12-22 16:00 (Time Zone: -06:00)																					
			2020	- 12 <b>-</b> 22	10.00 (1111	ie ZuileU	0.00)														
	ast Signed By		TED	RILLLE	:MKE																
User:																					
Name: Terrill Lemke																					
E-Mail: tlemke@lanl.go				gov																	

2020-12-22 16:44 (Time Zone: -06:00)

# **ATTACHMENT 6: ANNUAL REPORTS**



### **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
William R. Mairson, ALDESHQSS, wrmairson@lanl.gov
Enrique Torres, EWP, etorres@lanl.gov
Jennifer E. Payne, EPC-DO, jpayne@lanl.gov
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



# **ATTACHMENT 1**

# 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	-		-	-		-		-
TA-3-29 Machine Shop	No Exposure	1	-			_	-	-		_
TA-3-30 Warehouse	No Exposure	1	2	101		-	-	-	-	2
TA-3-32 Metal Shop	No Exposure	1					-	4	-	-
TA-3-34 Metal Shop	No Exposure	1	-	-	-	-	-	1	2	
TA-3-38 Carpenter Shop	Active	12	4	1	3	_	-	+	-	4
TA-3-38 Metals Fabrication Shop	Active	12	2	8	5	-	2		2	19
TA-3-39 and 102 Metal Shop	No Exposure	1	1		1					2
TA-3-40, Room 1315 Machine Shop	No Exposure	1	- 14			_		_	_	-
TA-3-66 Sigma Facility	No Exposure	1	3		2	_		-	-	5
TA-3-2206 Warehouse	No Exposure	1	-	- E	1	_	1-	_		1
TA-9-28 Heavy Equipment Maintenance	No Exposure	1	1	-	-	_	-	_	_	1
TA-14-23 Burn Cage	No Exposure	1		1,000	-	-	-	_	_	
TA-15-185 Phermex	No Exposure	1	-	<u> </u>	-		-	-	_	
TA-15-313 Machine Shop	No Exposure	1	2					4	_	2
TA-22-52 Machine Shop	No Exposure	1	-	<u></u>		-	-	-	-	-
TA-33-39 Machine Shop	No Exposure	1	_	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	_	-	-	-	-	-

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	1	-	-	_	-	( <u>-</u> ) <del>(</del>   1		=	-
TA-35-2 Machine Shop	No Exposure	1				-	-	-	_	-
TA-35-125 Machine Shop	No Exposure	11	-	_	1	-	-	-	-	1
TA-46-31 Machine Shop	No Exposure	1	1	-	1	_	_	-	-	2
TA-46-77 Machine Shop	No Exposure	1	-		1		-	-	-	1
TA-48-8 Machine Shop	No Exposure	1	-	-	-		-	-	-	-
TA-50-54 Machine Shop	No Exposure	1	-	<del></del>	-	-	-		-	_
TA-50-69 WCRRF	No Exposure	1	-	-	-		-	-	345	_
TA-53-2 Machine Shop	No Exposure	1	-		1	<u> </u>	-	-	_	1
TA-53-16 Machine Shop	No Exposure	1	-	-	1	-	-	-		1
TA-53-26 Machine Shop	No Exposure	1	-	-	1	-		_	-	1
TA-54-38 Indoor TSD	No Exposure	1	-	_	1	T-1	-	-	-	-
TA-54 RANT	No Exposure	1	H-	-				_	-	-
TA-55-3 Metal Shop	No Exposure	1		-	1	-	-			1
TA-55-PF-4 Indoor TSD	No Exposure	1	-	_	-	<del></del>	_	-	-	-
TA-55-5 Warehouse	No Exposure	1	1	-		o-c			-	1
TA-55-268 Warehouse	No Exposure	1	( <del></del> -		<del></del>		-	. 4	-	_
TA-55-314 Warehouse	No Exposure	1	_	-	<del>-</del>			<u> </u>	-	-
TA-55-355 TSD	No Exposure	1	1	_	<del></del>		= =	_	-	1
TA-55-432 Warehouse	No Exposure	1	- 4	-	<del></del>	1	-		_	_
TA-55 Outdoor TSD	No Exposure	1	7-5	-	<del></del> -	-		-	=	
TA-60 Asphalt Batch Plant	Active	12	4	1	3	2	-	_	T	10
TA-60 MRF	Active	12	2		9	_	1		-	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	-	_	16
TA-63 Transuranic Waste Facility	No Exposure	1	2 <del></del> 1	-	-		4		-	_
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 Al, 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 Aroclor, 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 Al, 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

Attachment 1 LA-UR-20-20880

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.

# **ATTACHMENT 2**

# 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

# **ATTACHMENT 3**

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

EPC-DO: 20-032

LA-UR-20-20880

D /	4.4.4
Date:	JAN 2 9 2020
Date.	3AN 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



# **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)



# **ATTACHMENT 1**

# 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

A. Approval to Use Paper Annual Report Form
1. Have you been granted a waiver from electronic reporting from the EPA Regional Office*? 🛛 YES 🔲 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 approval:
Waiver granted:   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:
Date approval obtained:
"Note: You are required to obtain approval from the applicable EPA Regional Office prior to using this paper annual report 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.ctm">http://water.epa.gov/polwaste/npdes/stormwater/Stormwater-eNOI-System-for-EPAs-MultiSector-General-Permit.ctm</a>
B. Permit Information
1. NPDES ID: N M R 0 5 0 0 1 3
C. Facility Information
1. Facility Name: Los Alamos National Laboratory
2. Facility Phone: 5 0 5 - 6 6 5 - 2 3 9 7 Ext.
3. Facility Mailing Address:
Street: P 0 B 0 x 1 6 6 3 K 4 9 0
City: Los Alamos State: NM ZIP 87545-
County or Similar Government Subdivision: Los Alamos
4. Point of Contact:
First Name, Middle Initial, Last Name: Terrill   W Lemke
D. General Findings
1. Provide a summary of your past year's routine facility inspection documentation (see Part 3.1.2 of the permit). In addition, if you are an operator of an airport facility (Sector S) that is subject to the airport effluent limitations guidelines, and are complying with the MSGP Part 8.S.8.1 effluent limitation through the use of non-urea-containing delicers, provide a statement certifying that you do not use pavement delicers containing urea (e.g., "Urea was not used at Iname of airport) for pavement delicing in the past year and will also not be used in 2015." (Note: Operators of airport facilities that are complying with Part 8.S.8.1 by meeting the numeric effluent limitation for ammonia do not need to include this statement.)
Los Alamos National Laboratory (LANL), operated by Triad National Security, LLC (Triad), consists of 8 active industrial sites that operate under 7 different Sectors (A, D, F, N, O, P, and AA), 37 sites that qualify for a conditional exclusion for no exposure, and one inactive site. Permit coverage became effective on November 1, 2018. All 8 active sites were inspected according to the schedules identified in the site-specific Stormwater Pollution Prevention Plans (SWPPPs). The 37 no exposure sites and one inactive site were inspected between November 1, 2018 and January 9, 2019. A summary of inspections/evaluations and associated corrective actions are included in Table 1 (attached).

E. Certification I	E. 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	First Name, Middle Initial, Last Name: Terrill 1 1 W Lemke III							
Title:	Storm Water Team Leader							
Signature:	new fla Date: 0//30/2019							
E-mail:	t 1 e m k e 3 1 a n 1 . g o v							

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	-	-	-	
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	=	-	1-1	
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 1315 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	<u> 44.</u>	_	_	
TA-53-2 Machine Shop	No Exposure	1		_	-	
TA-53-16/0726 Machine Shop	No Exposure	1	4	_	2	
TA-53-26 Machine Shop	No Exposure	1	-	-	2	
TA-54-38 Indoor TSD	No Exposure	1	7.		_	
TA-54-38 Outdoor TSD	No Exposure	1		-	_	
TA-55-3 Metal Shop	No Exposure	1	-4	-	- 2	
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	-	-	-	
TA-55-355	No Exposure	1	-			
TA-55-432	No Exposure	1	-		1.4	

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 Outdoor TSD	No Exposure	1	-	-	4
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	_	<u> </u>	_
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 documentatio and failure to meet permit time frames per 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 and failure to meet permit time frames per 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	There are several pieces of metal for fabrication and old pieces of equipment that are rusting and not covered. Specific equipment and locations are as follows:	LANL was closed from 12/22/2018 through 1/03/2019. Starting on 12/26/2018, several snow events occurred. A walk down on 1/28/2019 determined the snow	No	Not documented.	1/31/2019	N/A	Inadequate documentation and failure to meet permit time frames per 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
				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.	melted enough to be place tarps on the identified equipment and metal by 1/31/2019.			-	Date	
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 and failure to meet permit time frames per 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 1/4/2019 the Excavation Permit was submitted and on 1/11/2019 the excavation review was completed. The R&G crew is waiting for utility 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 per 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 several locations within the TA-60-1 Heavy Equipment Yard, either metal storage racks are not covered, the existing covers need to be replaced, or metal is	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 and failure to meet permit time frames per 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
				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.	The steel was covered or removed on 12/21/2018.	Yes	Not documented.	N/A	12/21/2018	Inadequate documentation per 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 and failure to meet permit time frames per 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.	A piece of construction equipment (Hamm roller) was identified to be leaking fluids. However a drip pan with spill pads and pillows was in place underneath the Hamm roller to help capture any drips at the time of inspection from the small leak. By 1/7/2019, approximately 20 or more	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
					inches of leftover snow 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 12/17/2018 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.

# **ATTACHMENT 2**

Email correspondence from Nasim Jahan dated 9/26/2018

EPC-DO: 19-029

LA-UR: 19-20724

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

# **ATTACHMENT 3**

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 (yet zon rediv above the line = to

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)

Ø#+245, 13 12 EF6

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 7: ROUTINE FACILITY INSPECTIONS

## Los Alamos National Lab - ADESH

### Work Order MSGP-RI-63351

MSGP Routine Inspection Printed 11/7/2018 - 3:31 PM

lainte	nance Details				
•	t: Routine Facility Inspections Contact:	.9			
	NOV. 2010 (1-10/301-101-				
Reasoi	5346)  n: 2018 November Inspections  7: 53 a.m.				
Specia	I Instructions: NMR053195				
asks					
#	Description	Meas.	No	N/A	Yes
	er Information				
20	Describe the weather at time of inspection and document the temperature (F°).		工		_F_
Within	the Facility Boundary				
40	Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe.		г	_	
50	If "No" has a CAR been previously initiated for this new discharge?			-	-
30	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.		F	F	P
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.				
Outfall	Inspection (identify needed maintenance and repairs, failed control measures that nee	d replace	ment.	ога	
descri	ption of corrective actions in relevant task comment)		ĺ		
90	Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.		工		_F′
100	Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.		-	-	
110	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.				_ <u>_</u> _
Contro	→ ────────────────────────────────────	d roples	nont c		
	ption of corrective actions in relevant task comments).	u repiaci	nent, c	ı a	
	Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No"				
130	describe condition & need for Maintenance, Repair, or Replacement.				_F_
140	Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			_	
	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe				
150	condition & need for Maintenance, Repair, or Replacement.			工	_ <u>\</u> \_
160	<b>Rock Channel/Swale [6000204030004]</b> Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		_	_	
	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe				
170	condition & need for Maintenance, Repair, or Replacement.		Г		_F
180	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		г	г	
	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No"				_~
190	describe condition & need for Maintenance, Repair, or Replacement.				
	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No"				

Trench Drain [6000209040001] Control Measure is operating effectively? If "No"

Retention Pond [6000211010009] Control Measure is operating effectively? If "No"

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

210

220

Leonard	d Sandoval 11/1/2018 / 1				
Labor		g Hrs	ОТ Н	rs Oth	er H
abor					
470	additional control measures needed.			二	_F
	Are permit requirements satisfied with existing control measure(s)? If "No" describe				
	onal Control Measures				
450	Free of incidents of observed non-compliance not already identified above? If "No" describe.		_		_
Non-Co	ompliance				
430	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	F/	
420	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.				
410	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.			<u></u>	
400	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.			_~	
390	Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe.			_ <u>~</u> _	
380	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.				
370	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	<u>-</u> -	· -
360	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.				
350	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.				
340	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			_~	
330	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.				
320	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	<b>D</b> /	
310	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		_ [	_⊏∕	
300	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.			_⊏∕	<u>_</u>
290	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.			_P′	
280	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.			_F/	<u>_</u>
<b>270</b>	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.				<u>F</u>
Area/A	ctivity exposed to stormwater (identify needed mainteance or a description of corrective	action	s in rel	evant	task
250	EnviroSoxx w/ MetalLoxx [6000203200022] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		F		
240	EnviroSoxx w/ MetalLoxx [6000203200021] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		т.		
	Francis Community and the state of the state				

Report:
WO ID: Page of
Name/Z#: Lconad F. Sandala 114326  Signature (lead inspector): Lconad F. Land Date and Time: 11912018 8:35a.m.
Signature (lead inspector): Date and Time: 1/9/2018 8:35 a. w. "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 Store Gol DESK- UES
Signature: Reveall Ste Date: 12/12/2018  The 30-yard bins for shredded paper, Cardboard, of plastic/aluminum cans had Durnster Good Colors on Hen.  Durnster Good Colors on Hen inside the yard Loke Colored y tarps.  Bins with metal in them inside the yard Loke colored y tarps.  The Carcycle vetertion pand had ice in it.

## Los Alamos National Lab - ADESH

### Work Order MSGP-RI-63451

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

Requested:	12/17/2018 4:33:38 PM	Target:	12/31/2018	MSGP Program	
Procedure:	MSGP Routine Facility Inspection (EPC-CP-Form- 1020.1)		Normal / Inspection Utilities and Infrastructure	品 RG121.9 ♣ TA-60 MRF	
Last PM:	10/26/2018 12/17/2	018	(.100	•	
Project:	Routine Facility Inspections Dec. 2018 (P-MSGP-RI- 5353)	Kemp. 33°F	Whigh of 45°F	Contact: Phone:	
Reason: 20	018 December Inspections	Wi	Ld-Calm		
			10:00 a.m.		

10:00 a.m.				
Description	Meas.	No	N/A	Yes
ner Information				
Describe the weather at time of inspection and document the temperature (F°).		П	Г	F
the Facility Boundary				
				,
inspection? If "Failed" describe.		Г		V
				工
				F
Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.		П	П	F/
iption of corrective actions in relevant task comment)	ed replac	ement,	or a	
		<u>. []</u>	厂	
Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.		П		F/
<b>Monitored Outfall [029]</b> Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.			Г	F/
ption of corrective actions in relevant task comments).	ed replac	ment, c	ora	
Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		П		F/
Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	П	<b>D</b>
Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance. Repair, or Replacement.		П	Г	
Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No"		П	Г	
Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe		Г		_ <u>~</u> _
Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe		Г	Г	
Base Course Swale [6000204100002] Control Measure is operating effectively? If "No"		П	Г	
Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		П	Г	
Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	Г	
Retention Pond [6000211010009] Control Measure is operating effectively? If "No"		Г		
Drop Inlet with Floc logs [6000209030018] Control Measure is operating effectively? If			H	1
	Description  Describe the weather at time of inspection and document the temperature (F°).  In the Facility Boundary  Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe.  If "No" has a CAR been previously initiated for this new discharge?  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 "No" describe.  It she facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.  In Inspection (identify needed maintenance and repairs, failed control measures that ne iption of corrective actions in relevant task comment)  Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  In Measures (identify needed maintenance and repairs, failed control measures that ne iption of corrective actions in relevant task comments).  Asphalt Berm [600020340001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Channel/Swale [6000203400001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Check Dam [6000204100002] Control Measure is operating effectively? If "No" describe	Description  Describe the weather at time of inspection and document the temperature (F°).  In the Facility Boundary  Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe.  If "No" has a CAR been previously initiated for this new discharge?  Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.  Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.  Il inspection (identify needed maintenance and repairs, failed control measures that need replace prion of corrective actions in relevant task comment)  Monitored Outfall [029] Free of Evidence of Frosion? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No" describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060006] Control Measure is operating effe	Description  Describe the weather at time of inspection and document the temperature (F°).  In the Facility Boundary  Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Falled" describe.  If "No" has a CAR been previously initiated for this new discharge?  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 "No" describe.  Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.  In Inspection (identify needed maintenance and repairs, failed control measures that need replacement, prition of corrective actions in relevant task comment)  Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  In Measures (identify needed maintenance and repairs, failed control measures that need replacement, option of corrective actions in relevant task comments).  Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Channel/Swale [600020400001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Check Dam [600020400007] Control Measure is operating	Description  The Information Describe the weather at time of inspection and document the temperature (F°).  The Facility Boundary Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Falled" describe.  If "No" has a CAR been previously initiated for this new discharge?  Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.  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 "No" describe.  Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.  Inspection (identify needed maintenance and repairs, failed control measures that need replacement, or a pition of corrective actions in relevant task comment)  Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  In Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No" describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No" describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No" describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No" describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Figure 1 (1990) Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Figure 1 (1990) Free of Evidence of Pollutants in Discharg

240 " E 250 "	EnviroSoxx w/ MetalLoxx [6000203200021] Control in No" describe condition & need for Maintenance, Repartmersorx w/ MetalLoxx [6000203200022] Control in No" describe condition & need for Maintenance, Repartmersors	ir, or Replacemer	it.		Б	Г [/
50 <u>"</u> .rea/Acti		Measure is onera				
						<u> </u>
,,,,,,,,	vity exposed to stormwater (identify needed maint	eance or a desc	ription of correcti	ve actions	in relev	ant task
70 a	Material loading/unloading and storage areas: controls and operating)? If "No" describe.	adequate (appro	priate, effective,	Lepux	-	
	Fransfer areas for substances in bulk: controls adequation operating)? If "No" describe.	te (appropriate, e	ffective, and		П	F
	Product/chemical storage areas (raw material): controls and operating)? If "No" describe.	s adequate (appr	opriate, effective,		г	F
	.iquid tank storage/secondary containment: controls ac and operating)? If "No" describe.	dequate (appropr	iate, effective,		Г	F
	ndustrial processing and finished product storage area effective, and operating)? If "No" describe.	as: controls adequ	uate (appropriate,		г	F/ F
	Equipment operation and maintenance areas: controls and operating)? If "No" describe.	adequate (appro	priate, effective,		П	P/ r
	Fueling areas: controls adequate (appropriate, effective describe.	e, and operating)'	? If "No"	_	П	PF
	Outdoor vehicle and equipment washing areas: control and operating)? If "No" describe.	s adequate (appr	opriate, effective,		Г	F/ r
50 N	Machinery: controls adequate (appropriate, effective, a	nd operating)? If	"No" describe.		Г	F F
V	Naste handling and disposal areas: controls adequate operating)? If "No" describe.				П	Б/ Г
	Frodible areas/construction: controls adequate (approp No" describe.	oriate, effective, a	nd operating)? If		Б	F/ F
	ocations and sources of run-on to the site: controls ac and operating)? If "No" describe.	dequate (appropri	ate, effective,		Г	F/ F
	Non-stormwater/illicit connections: controls adequate (apperating)? If "No" describe.	appropriate, effec	tive, and		Г	FF
	Salt storage piles or pile containing salt: controls adequipperating)? If "No" describe.	uate (appropriate	, effective, and		Б	FF
	Dust generation and vehicle tracking: controls adequat operating)? If "No" describe.	e (appropriate, et	ffective, and		_П	F/ F
	Housekeeping (Industrial materials/residues/trash in coadequate (appropriate, effective, and operating)? If "No		water): controls			<u>г</u> г
	eaks and spills: controls adequate (appropriate, effect describe.	tive, and operatin	g)? If "No"			F/ L
	ipliance Free of incidents of observed non-compliance not alreadescribe.	ady identified abo	ve? If "No"			г_ <i>Б</i>
ddition	al Control Measures					
	Are permit requirements satisfied with existing control additional control measures needed.	measure(s)? If "N	lo" describe			Г_Б⁄
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abor.		Assigned	Work Date	Peg Hre	OT Hea	Other Hr
	Sandoval	12/17/2018 / 1	TOIR Date	reg ilis	01 1113	Cale His
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Vheeler,	Holly	12/17/2018 / 1	-	-	•	-

Report:	6 has teas an its cake that need to be
vegaved to metal sharings at the	e has tead and to cake that held to be
Shept up embed into the M	OCP tracking database as CAR# 1430.
entered into the MSGP tacking	y database as CAR#1431:
WO ID: Page	of Hall Uheeler from EPC-CP
Name/Z#: Leonard F. Sandahl 1143	helped perform the inspection which is considered an annual
Signature (lead inspector): Leonal F. Sandon	Date and Time: 12/11/2018 10:21 a.m.
"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)

Signature: Russell Stone & DESH-UIS

Signature: Russell Stone & DESH-UIS

Signature: Russell Stone & Dest-UIS

Date: 1/7/2019

There is another 10 yard voll-off bin with metal shavings at the back of the voll-off bin & on the ground that need to be sweet up entered into the MSGP tracking databased as CAR#1432.

## Los Alamos National Lab - ADESH

### Work Order MSGP-RI-63460

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

	sted: 1/15/2019 2:09:16 PM       Target: 1/31/2019         lure: MSGP Routine Facility       Priority/Type: Normal / Inspection         Inspection (EPC-CP-Form-1020.1)       Department: Utilities and Infrastructure	9			
ast Pi rojec	VI: 12/17/2018 125/2013 Temp. 120 Ful high of 330 F				
easo	n: MSGP Routine Facility Inspection 9:00 a.m.				
sks					
#	Description	Meas.	No	N/A	Yes
<b>Veat</b> h	er Information  Describe the weather at time of inspection and document the temperature (F°).		_		-/
<b>Vithi</b> r IO	Is the Facility Boundary  Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe.		П	п	<b>5</b> /
50	If "No" has a CAR been previously initiated for this new discharge?		F		
0	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.			Г	<u></u>
0	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.			П	[Z
	I Inspection (identify needed maintenance and repairs, failed control measures that need ption of corrective actions in relevant task comment)  Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No",		Г	П	
100	describe.				
			-	10/2	
110	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.		П		
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Control   Cont	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  DI Measures (identify needed maintenance and repairs, failed control measures that need ption of corrective actions in relevant task comments).  Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Trench Drain [6000209040001] Control Measure is operating effectively? If "No"	d replaci			

"No" describe condition & need for Maintenance, Repair, or Replacement.  EnviroSoxx w/ MetalLoxx [6000203200021] Control Measure is operating effectively?	14			
"No" describe condition & need for Maintenance, Repair, or Replacement.				
EnviroSoxx w/ MetalLoxx [6000203200022] Control Measure is operating effectively? "No" describe condition & need for Maintenance, Repair, or Replacement.	lf		П	
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Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	П	<b>~</b>
Transfer areas for substances in bulk: controls adequate (appropriate, effective, and			/	
		- 1		
and operating)? If "No" describe.				П
Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.		ш	<b>[</b>	<b>′</b> п
effective, and operating)? If "No" describe.	,	Ţį.	<u>-</u>	
Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			F	
Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		П	<b>E</b> /	_
	,		_ <u></u>	7
Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.			Г	F
Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			_/	´
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Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		П	<u> </u>	
Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe.			P	
operating)? If "No" describe.			P	<u></u>
operating)? If "No" describe.		ட	_F_	
Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.				<b>~</b>
Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.			F/	<u>_</u>
ompliance				
Free of incidents of observed non-compliance not already identified above? If "No" describe.			п	<b>5</b> /
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Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.				_F_
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Assigned Work Date	Reg Hrs	OT Hr	s Oth	er Hrs
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	"No" describe condition & need for Maintenance, Repair, or Replacement.  ctivity exposed to stormwater (identify needed mainteance or a description of corre int).  Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.  Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.  Product/chemical storage areas (raw material): 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.  Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Equipment operations adequate (appropriate, effective, and operating)? If "No" describe.  Machinery: 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.  Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.  Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe.  Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe.  Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe.  Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe.  Housekeeping (Industrial materials/residues/trash in	"No" describe condition & need for Maintenance, Repair, or Replacement.  ctivity exposed to stormwater (identify needed mainteance or a description of corrective actions).  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, and operating)? If "No" describe.  Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.  Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.  Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.  Liquid tank and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Equipment operation and maintenance 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.  Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Waste handling and disposal areas: 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.  Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe.  Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.  Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.  Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describ	"No" describe condition & need for Maintenance, Repair, or Replacement.  ctivity exposed to stormwater (identify needed mainteance or a description of corrective actions in rel int).  Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.  Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.  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.  Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.  Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.  Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.  Fueling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.  Fuel operating If the operating If If Tho describe.  Fuel operating If If No" describe.	"No" describe condition & need for Maintenance, Repair, or Replacement.  Citivity exposed to stormwater (identify needed mainteance or a description of corrective actions in relevant timt).  Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.  Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.  Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.  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.  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"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering 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-UTS

Signature: Reveal Stone Date: 1/28/2019

## Los Alamos National Lab - ALDESHQSS

### Work Order MSGP-RI-63472

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

lainte	nance Details	F	rinted 2	:/12/2019	9 - 9:04 AN
Proced Last Pi Project	Inspection (EPC-CP-Form-1020.2)  M: 12/17/2018 2 21 2019				
asks					
#	Description	Meas.	No	N/A	Yes
Weath	er Information				_
20	Describe the weather at time of inspection and document the temperature (F°).		工		_F_
Within	the Facility Boundary				
		t			
40		4	$\Box$		
50	If "No" has a CAR been previously initiated for this new discharge?			F	
60	Is the facility free of discharge of pollutants at the time of inspection? If "No" description and the facility free of discharge of pollutants at the time of inspection?	ibe.			V
70		ge			_/
70	system, if No describe.	7			
		that need replac	ement,	or a	
aescri <sub>l</sub> 90	•		_	_	-/
90					<u> </u>
100			П		
	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Rec	eiving			
110					
120		"No"	_	_	_/
120	describe.				
		that need replac	ment, c	or a	
aescn	·	ı			
140			г	г	<b>c</b> /
					_~_
150			$_{\perp}\Gamma$	工	_F_
100		scribe		_	_/
160		N 15 HN 1 H		. <u> </u>	
170		/ IT "NO"		_	<b>-</b> /
-	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" described and the second s	ribe			<b>_</b>
180	condition & need for Maintenance, Repair, or Replacement.	ARE .			_⊏∕
_	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" descriptions and the control of the c	ribe			
190	condition & need for Maintenance, Repair, or Replacement.		工	上	
200	<b>Base Course Swale [6000204100002]</b> Control Measure is operating effectively? describe condition & need for Maintenance, Repair, or Replacement.	It "No"		_	_/
	topialon a need for maintenance, repair, or replacement,				~

Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No"

Trench Drain [6000209040001] Control Measure is operating effectively? If "No"

Retention Pond [6000211010009] Control Measure is operating effectively? If "No"

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

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

210

220

230

	describe condition & need for Maintenance, Repair, o	r Replacement.				
240	Drop Inlet with Floc logs [6000209030018] Control "No" describe condition & need for Maintenance, Rep	Measure is operating effectively? If air, or Replacement.			_	F/
250	EnviroSoxx w/ MetalLoxx [6000203200021] Control "No" describe condition & need for Maintenance, Rep	Measure is operating effectively? If air, or Replacement.		Б		F/
260	EnviroSoxx w/ MetalLoxx [6000203200022] Control "No" describe condition & need for Maintenance, Rep	Measure is operating effectively? If air, or Replacement.				<b> </b>
	ctivity exposed to stormwater (identify needed mair	nteance or a description of correc	tive action	s in rel	evant t	ask
comme	·	and an extended the second second				
280	Material loading/unloading and storage areas: control and operating)? If "No" describe.			上	工	_F/
290	Transfer areas for substances in bulk: controls adequoperating)? If "No" describe.			二		
300	Product/chemical storage areas (raw material): contro and operating)? If "No" describe.					
310	Liquid tank storage/secondary containment: controls a and operating)? If "No" describe.	adequate (appropriate, effective,			_ <del>_</del> _	<u></u>
320	Industrial processing and finished product storage are effective, and operating)? If "No" describe.	eas: controls adequate (appropriate,		Г	<b>~</b>	
330	Equipment operation and maintenance areas: control and operating)? If "No" describe.	s adequate (appropriate, effective,			F/	
340	Fueling areas: controls adequate (appropriate, effective describe.	ve, and operating)? If "No"				
350	Outdoor vehicle and equipment washing areas: control and operating)? If "No" describe.	ols adequate (appropriate, effective,				
360	Machinery: controls adequate (appropriate, effective,	and operating)? If "No" describe.				
370	Waste handling and disposal areas: controls adequate operating)? If "No" describe.					_ <u>~</u> _
380	Erodible areas/construction: controls adequate (appro	priate, effective, and operating)? If			<u>~</u>	
390	Locations and sources of run-on to the site: controls a and operating)? If "No" describe.	adequate (appropriate, effective,			<u>-</u>	<u></u>
100	Salt storage piles or pile containing salt: controls adec operating)? If "No" describe.	quate (appropriate, effective, and				
110	Dust generation and vehicle tracking: controls adequate operating)? If "No" describe.	ate (appropriate, effective, and		П	<u></u>	Г
120	Housekeeping (Industrial materials/residues/trash in cadequate (appropriate, effective, and operating)? If "N				П	
130	Leaks and spills: controls adequate (appropriate, effective describe.	ctive, and operating)? If "No"		Б		
lon-Co	ompliance					
150	Free of incidents of observed non-compliance not alredescribe.	eady identified above? If "No"				_F′
Additio	nal Control Measures					
170	Are permit requirements satisfied with existing control additional control measures needed.	measure(s)? If "No" describe				F/
_				-	_	
bor						
_abor		Assigned Work Date	Reg Hrs	OT Hr	s Oth	er Hrs
.eonard	d Sandoval	2/11/2019 / 1	-			
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Report:						

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	915 2 115		
1-1741			
Legnard F. Sandaral	2/21/2019 10:	30 a.m.	
Signature / Name	Date	Signature / Name	Date
nfirm the information as recorde	d is true accurate and com	nlete	

"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".

rint name and title:	Russell	Stone	GC	DESH	-uts	
Signature:	Zerall !	Ster		Date:_	2/25/2019	

Maintenance Details -

### Work Order MSGP-RI-63481

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

	ted: 2/26/2019 11:51:57 AM Target: 3/31/2019	1.9			
_ast PM Project	1020.2) 1: 1/25/2019 3/19/2019 Temp. 36 Fulhigh of 51° F Routine Facility Inspections March 2019 (P-MSGP-RI- Pott Clardy  Contact: Phone:	WIKE			
Reasor	5355)  1: 2019 March Inspections  601. Chance of precipitation  Lind - Less than 5 mpl  8: 40 a.m.	^			
asks					
#	Description	Meas.	No	N/A	Yes
	er Information		_		_/
20	Describe the weather at time of inspection and document the temperature (F°).				_F
<b>W</b> ithin	the Facility Boundary				
40	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?		+	-	
30	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.				-
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.			Г	
100	Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.				<u>_</u>
110	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.		Б	Г	_F/
120	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No" describe.				
	I Measures (identify needed maintenance and repairs, failed control measures that neption of corrective actions in relevant task comments).  Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No"	ed replac	_		-/
150	describe condition & need for Maintenance, Repair, or Replacement.  Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		.E.		<u>-</u> /
	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe				
160	condition & need for Maintenance, Repair, or Replacement,				_5_
170	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				
180	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				<u> </u>
190	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			Г	
200	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		_E	Г	_⊏∕
210	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			Г	
220	Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Б	Г	F/

	Drop Inlet with Floc logs [6000209030018] Control Measure is operating effectively? If		
240	"No" describe condition & need for Maintenance, Repair, or Replacement.	Б	<u> </u>
250	EnviroSoxx w/ MetalLoxx [6000203200021] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	- T	ПБ
260	EnviroSoxx w/ MetalLoxx [6000203200022] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	П	ПБ
\ #00/A	ctivity exposed to stormwater (identify needed mainteance or a description of correct	ivo actions in re	lovent took
omme		ive actions in re	ilevanit task
	Material loading/unloading and storage areas: controls adequate (appropriate, effective,		
280	and operating)? If "No" describe.		<u> </u>
290	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u> </u>
200	Product/chemical storage areas (raw material): controls adequate (appropriate, effective,	_	_/_
300	and operating)? If "No" describe.  Liquid tank storage/secondary containment: controls adequate (appropriate, effective,		
310	and operating)? If "No" describe.		<u> </u>
320	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	Г	E L
200	Equipment operation and maintenance areas: controls adequate (appropriate, effective,		_/_
330	and operating)? If "No" describe.  Fueling areas: controls adequate (appropriate, effective, and operating)? If "No"	<u> </u>	
340	describe.	П	
350	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	_	_/ -
350 360	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.		_ <u> -</u>  -
	Waste handling and disposal areas: controls adequate (appropriate, effective, and		
370	operating)? If "No" describe.		
380	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.		PI
390	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		P
400	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	Г	FI
410	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.		г/ г
110	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls 2	charto	/
420	adequate (appropriate, effective, and operating)? If "No" describe.	of Report P	
430	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	, <u> </u>	<u> </u>
Non-Co	mpliance		
450	Free of incidents of observed non-compliance not already identified above? If "No"	_	
450	describe.		
Additio	nal Control Measures		
470	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.	_	
+70	additional control measures needed.		
abor			3 -
Labor	Assigned Work Date	Reg Hrs OT I	irs Other i
Leonard	Sandoval 2/26/2019 / 1		
abor R	Report		
Comple	stad:		
	TAME TO SERVICE TO SER		

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Damaged metal Bollard	& Knocked dain	Stop Sign at the entains	AR# 1478.
Leaned F. Sandah	3/19/2019 9:150	1.m.	
Signature / Name I confirm the information as recorded	is true, accurate and con	Signature / Name nplete.	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 Store	UI DESH GL
Signature: Result Str	Date: 3/25/2019

**Maintenance Details** 

### Work Order MSGP-RI-63546

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

Request	ed: 4/9/2019 2:07:07 PM Target: 4/30/2019 SGP	_			
Procedu	re: MSGP Routine Facility Priority/Type: Normal / Inspection 品 RG121				
	Inspection (EPC-CP-Form- Department: Utilities and Infrastructure ATA-60 I	MRF			
and DM	1020.2) 4/24/2019 Five 36°FUhish of 63°F				
ast PM:	O's 16. July Contrate				
Project:	Routine Facility Inspections April 2019 (P-MSGP-RI-				
	5361)				
	Dird-Super				
Reason:	MSGP Routine Facility Inspection				
ooko					
asks -					
#	Description	Meas.	No	N/A	Yes
	•				
Weathe	Information				
20	Describe the weather at time of inspection and document the temperature (F°).				
Within t	he Facility Boundary				
	Is the facility free of new discharges of pollutants that have occurred since the last				
40	inspection? If "Failed" describe.				F
50	If "No" has a CAR been previously initiated for this new discharge?			P/	
30	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.			F	E/
	Is the facility free of evidence of, or the potential for, pollutants entering the drainage				
70	system. If "No" describe.				
90	Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No",				
100	describe.		ــــــــــــــــــــــــــــــــــــــ	i	
110	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.			Г	<u> [</u>
	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No"		_	_	_/
120	describe.				
	Measures (identify needed maintenance and repairs, failed control measures that nee	d replaci	ment, c	or a	
descript	tion of corrective actions in relevant task comments).				
140	Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			_	_/
140					<u> </u>
150	Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				<b>E</b> /
100	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe				
160	condition & need for Maintenance, Repair, or Replacement.				<b>F</b> /
100	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No"				
170	describe condition & need for Maintenance, Repair, or Replacement.				
-	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe				
180	condition & need for Maintenance, Repair, or Replacement.				F/
190	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			Г	
	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No"			, (	
200	describe condition & need for Maintenance, Repair, or Replacement.				F/
	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No"				
210	describe condition & need for Maintenance, Repair, or Replacement.				_F/
	Trench Drain [6000209040001] Control Measure is operating effectively? If "No"				
220	describe condition & need for Maintenance, Repair, or Replacement.				P
230	Potentian Pand [6000211010009] Control Measure is operating effectively? If "No"				E/

	Report eted:				
<b>_abor</b> _eonar	d Sandoval  Assigned Work Date 4/1/2019 / 1	Reg Hrs	OT Hr	s Oth	er Hi
abor					
170	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.		<u></u>	Б	
Additio	onal Control Measures				
<b>lon-C</b>	ompliance Free of incidents of observed non-compliance not already identified above? If "No" describe.				_F
130	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.			<u>_</u>	Г
120	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.			Г	F
10	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.			<b>F</b> /	<u></u>
100	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	 F/	
390	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.			<u></u>	
380	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.			<u>-</u>	
370	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.				_ <u>~</u> _
50 60	and operating)? If "No" describe.  Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.		Ę	<u></u>	
40	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective,			<b>P</b>	<u></u>
30	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		ഥ	<u></u> F/	
320	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			<b>P</b>	
310	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.			_F/	
300	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	P	
290	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.		Б		
Area/A commo 280	activity exposed to stormwater (identify needed mainteance or a description of correction).  Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	ive actions	s in rele	evant t	ask
260	"No" describe condition & need for Maintenance, Repair, or Replacement.				
250	EnviroSoxx w/ MetalLoxx [6000203200021] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  EnviroSoxx w/ MetalLoxx [6000203200022] Control Measure is operating effectively? If				_⊏∕
40	"No" describe condition & need for Maintenance, Repair, or Replacement.		<del></del> _	- 1	

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Jake also replaced.			
1 124 1			
Leaned F. Sandulal	4/24/2019 11:06	ım.	
Signature / Name	Date	Signature / Name	Date
nfirm the information as record	ed is true, accurate and com	nlete	

"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 G	SL Desh - Uts
Signature: Russell Stee Laven Armijo DOE Campliance of Pe Karen had questions regarding the	Date: 4/28/2019  amitting uso present during the inspection e variety release of recycled material fram

**Maintenance Details** 

### Work Order MSGP-63661

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

-	ted: 5/8/2019 11:30:29 AM Target: 5/31/2019	Program 1.9			
	Inspection (EPC-CP-Form- Department: Utilities and Infrastructure 🎄 TA-60				
4 584	1020.2) 5/K/2019 The SOFI high of 74°F				
ast PM: roject:	- 4/24/2019   1 /24/2019				
rojeci.	May 2019 (P-MSGP-RI-				
	Und Stollmph				
eason:	5371) Wind Stolomph MSGP Routine Facility Inspection 8:07 a.m.				
	0 0 1 1				
asks					
м	Description				
#	Description	Meas.	No	N/A	Yes
	r Information				
20	Describe the weather at time of inspection and document the temperature (F°).		ഥ	工	<u>_</u> F_
Nithin t	the Facility Boundary				
	Is the facility free of new discharges of pollutants that have occurred since the last				
10	inspection? If "Failed" describe.			工	F
50	If "No" has a CAR been previously initiated for this new discharge?			_ [ _	Г
30	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.		_⊏_	匚	
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.		_	_	
0	system, if No describe.				
lescrip	Inspection (identify needed maintenance and repairs, failed control measures that need tion of corrective actions in relevant task comment)  Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.				_F⁄
	tion of corrective actions in relevant task comment)			ога  Г	<u>_</u>
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	describe condition & need for Maintenance, Repair, or Replacement.		
240	Drop Inlet with Floc logs [6000209030018] Control Measure is operating effectively? "No" describe condition & need for Maintenance, Repair, or Replacement.	If	ГГБ
250	EnviroSoxx w/ MetalLoxx [6000203200023] Control Measure is operating effectively "No" describe condition & need for Maintenance, Repair, or Replacement.	? If	
260	EnviroSoxx w/ MetalLoxx [6000203200024] Control Measure is operating effectively "No" describe condition & need for Maintenance, Repair, or Replacement.	? If	
Area/Ac	ctivity exposed to stormwater (identify needed mainteance or a description of cor	ective action	ns in relevant task
omme	•		
280	Material loading/unloading and storage areas: controls adequate (appropriate, effective and operating)? If "No" describe.	9,	
200	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and	=-	
90	operating)? If "No" describe.		
800	Product/chemical storage areas (raw material): controls adequate (appropriate, effective and operating)? If "No" describe.	'e,	Г Б Г
10	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.		
20	Industrial processing and finished product storage areas: controls adequate (appropria effective, and operating)? If "No" describe.	te,	
30	Equipment operation and maintenance areas: controls adequate (appropriate, effective and operating)? If "No" describe.	), 	ГРГ
40	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u> </u>
50	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effection and operating)? If "No" describe.	/e, 	<u>r p/r</u>
60	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.		
70	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u> </u>
80	Erodible areas/construction: controls adequate (appropriate, effective, and operating)?  "No" describe.	If	<u> </u>
90	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u> </u>
00	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u> </u>
110	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	0 ( )	_ F F _
20	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	Now Repor	4 P C C
30	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u>r</u> p/r
lon-Co	mpliance		
50	Free of incidents of observed non-compliance not already identified above? If "No"		/
JU	describe.		<u> </u>
Addition	nal Control Measures		
70	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.		
70	additional control measures needed.		
bor			
_abor	Assigned Work Date	Reg Hrs	OT Hrs Other Hrs
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bor R	leport		
comple	eted:		
Report:			

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Leanard F. Sandalal	5/16/2019 8:350		
Signature / Name	Date	Signature / Name	Date
nfirm the information as recorded	is true, accurate and con	nplete.	

"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".

Signature: Russell Ster Date: 5/20/2019

**Maintenance Details** 

### Work Order MSGP-RI-63721

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

-	Sted: 6/10/2019 12:38:59 PM  Target: 6/28/2019  Gure: MSGP Routine Facility Inspection (EPC-CP-Form-1020.2)  M: 5/16/2019  Target: 6/28/2019  Priority/Type: Normal / Inspection Department: Utilities and Infrastructure  TA-60  Cautaster	1.9			
rojec	t: Routine Facility Inspections June 2019 (P-MSGP-RI-			,	٥.
easo	n: 2019 June Inspections	ive in	Eas	ton	HIZ
	8:00 a.m.				
	₹·₩a·m.				
asks					
#	Description	Meas.	No	N/A	Yes
		IVICAS.	NO	IN/A	162
	er Information			_	_/
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Vithir	the Facility Boundary				
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60	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		厂		_F/
70	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		г	_	⊏∕
80	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			Г	
90	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				F/
200	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г		[/
210	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				_F/
20	Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г		
30	Retention Pond [6000211010009] Control Measure is operating effectively? If "No"				

	describe condition & need for Maintenance, Repair, or Replacement.		
240	Drop Inlet with Floc logs [6000209030018] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г Б/
250	EnviroSoxx w/ MetalLoxx [6000203200023] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		
260	EnviroSoxx w/ MetalLoxx [6000203200024] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		
Area/A	activity exposed to stormwater (identify needed mainteance or a description of corrective a	ctions in rele	vant task
comme	•		
280	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
290	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.		F/ I
300	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.		F/ I
310	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.		
320	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		F/ [
330	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	Г	P D
340	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		F
350	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		F C
360	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.		
370	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		
380	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.		F C
390	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		F/ F
400	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.		E/_F
410	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.		P/_C
420	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.		
430	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.		
Non-Co	ompliance		
450	Free of incidents of observed non-compliance not already identified above? If "No" describe.		
Additio	onal Control Measures		
470	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
abor F	Report —		
Comple			
Report			

Leaned F. Sandaral	6/21/2019 8:26 a.m.		
Signature / Name onfirm the information as recorded	/ /Date d is true, accurate and complete	Signature / Name	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 Stone GL 855H UTS	
Signature: Date: D	30 grad motal for verycle bins earlie from Carring in Cartact

**Maintenance Details** 

### Work Order MSGP-RI-63832

MSGP Routine Inspection Printed 7/17/2019 - 1:17 PM

Proced	ure: MSGP Routine Facility Inspection (EPC-CP-Form- 1020.2)  Priority/Type: Normal / Inspection □ Utilities and Infrastructure  Utilities and Infrastructure  ↑ 74-60				
Last PN Project	1: 6/21/2019 11 2mg. 00 1				
Reason	i: MSGP Routine Facility Inspection  8:46 a.m.				
Tasks					
#	Description	Meas.	No	N/A	Yes
Weather 20	er Information  Describe the weather at time of inspection and document the temperature (F°).		Г	П	
Within	the Facility Boundary				
40	Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe.		Г	Б	F/
50	If "No" has a CAR been previously initiated for this new discharge?			F	
60	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe,				
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.			г	<u></u>
Outfall	Inspection (identify needed maintenance and repairs, failed control measures that need rep	lacement	or a desi	crintic	n of
correct	tive actions in relevant task comment)	,			
90	Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.				_F_
100	Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.			Г	_ [7
110	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water?   "No", describe.	f 	_П_	Г	
120	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No" describe.			Г	
Control correct	I Measures (identify needed maintenance and repairs, failed control measures that need repairs actions in relevant task comments).  Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	lacment, c	r a desci	ription	of
150	Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	Г	<u></u>
160	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		П		<u>~</u>
170	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				[-/
180	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				<u></u>
190	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition 8 need for Maintenance, Repair, or Replacement.				<u> </u>
200	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			Г_	F/
210	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			Г	<b>C</b> /
220	Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				_F/
230	Retention Pond [6000211010009] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	.,			<b>F</b> /
240	Drop Inlet with Floc logs [6000209030018] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			П	<b>F</b>
250	EnviroSoxx w/ MetaiLoxx [6000203200023] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	П	<b>F</b> /
260	EnviroSoxx w/ MetalLoxx [6000203200024] Control Measure is operating effectively? If "No"		П		F

ons in relevant task comment).			
Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)?  If "No" describe.  Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and			
п г/ п			
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Г 🗹 Г			
ГБГ			
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 operating)? If "No" describe.			
Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)?  If "No" describe.			
Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.			
/			
Reg Hrs OT Hrs Other Hrs			
Regins Of the Other the			
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 Stone Gol DOSH-UDS	
Signature: Date: 7/24/2019	
The 8 Dungotar Guad Cakes was delivered to the Material Recycling Facility	١.
From the 1A-3-5NBO Declares at the character publing metal damara 15 yard?	7
The 8 Dungoter Guad Cakes were delivered to the Material Recycling Facility from the TA-3-SM30 Waltance at the end of Tune.  The 8 Dungoter Guad Cakes were at the end of Tune.  The TA-3-SM30 Waltance at the end of Tune.  The TA-3-SM30 Waltance at the end of Tune.  Diving this inspection there was a backhoc pushing metal damage Kyard a Diving this inspection there was a backhoc pushing metal damage Kyard a Diving this inspection there was a backhoc pushing weady to be caked.  30 yeld metal for vecycle bins that were getting ready to be caked.	

**Maintenance Details** 

230

### Work Order MSGP-RI-63912

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

Proced Last P Projec	M: 7/19/2019 8 13 2019  Routine Facility Inspection (EPC-CP-Form-1020.2)  Routine Facility Inspections August 2019 (P-MSGP-RI-5393)  Priority/Type: Normal / Inspection Department: Utilities and Infrastructure  Utilities and Infrastructure  Contact: Phone:				
Reaso	n: 2019 August Inspections $\S: 2 \vdash a.m.$				
asks					
#	Description	Meas.	No	N/A	Yes
	er Information				
20	Describe the weather at time of inspection and document the temperature (F°).				<u> </u>
Withir	the Facility Boundary				
40	Is the facility free of new discharges of pollutants that have occurred since the last		_	_	-/
40	inspection? If "Failed" describe.	-			
50 50	If "No" has a CAR been previously initiated for this new discharge?		-	~	
30	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.		cП	г	E/
90 100	Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.			_ <u></u>	F/
110	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.				E/
120	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No" describe.			Г	F/
	ol Measures (identify needed maintenance and repairs, failed control measures that ne	ed replac	ment, d	or a	
<b>descr</b> i 140	ption of corrective actions in relevant task comments).  Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		-	_	-/
150	Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		 	. <u> </u>	<u> </u>
160	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	Г	<u>-</u>
170	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			Г	<u> </u>
180	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			Г	_F_
190	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		л.	Г	
200	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		П	Г	_F_
210	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			П	
220	Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			Ď.	E/

Retention Pond [6000211010009] Control Measure is operating effectively? If "No"

d Sandoval 8/15/2019 / 1				
Assigned Work Date rd Sandoval 8/13/2019 / 1	Reg Hrs	OT Hr	s Oth	ner Hi
additional control measures needed.		<u>Г</u>		
Are permit requirements satisfied with existing control measure(s)? If "No" describe				
describe.	_		Г.	_₽
ompliance Free of incidents of observed non-compliance not already identified above? If "No"				
describe.			<u>_</u> F⁄	
adequate (appropriate, effective, and operating)? If "No" describe.		<u> </u>		_F
operating)? If "No" describe.			<u> </u>	
operating)? If "No" describe.			<b>P</b>	上
and operating)? If "No" describe.				工
"No" describe.			<b>F</b>	
Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If				_ <u></u> _
Waste handling and disposal areas: controls adequate (appropriate, effective, and				<u>_</u>
and operating)? If "No" describe.		工	P	Г
describe.		工	P	Г
and operating)? If "No" describe.		厂	P	Г
effective, and operating)? If "No" describe.		工	<b>F</b>	Г
and operating)? If "No" describe.  Industrial processing and finished product storage areas: controls adequate (appropriate.			F/	厂
and operating)? If "No" describe.  Liquid tank storage/secondary containment: controls adequate (appropriate, effective,			P	
operating)? If "No" describe.  Product/chemical storage areas (raw material): controls adequate (appropriate, effective,				
and operating)? If "No" describe.  Transfer areas for substances in bulk: controls adequate (appropriate, effective, and			Г	_ [~
ent).  Material loading/unloading and storage areas: controls adequate (appropriate, effective,	uve action.			
	tive action	E in reli		
EnviroSoxx w/ MetalLoxx [6000203200024] Control Measure is operating effectively? If	-			
EnviroSoxx w/ MetalLoxx [6000203200023] Control Measure is operating effectively? If		<u></u>		<u> </u>
	EnviroSoxx w/ Metail.oxx [6000203200023] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  EnviroSox w/ Metail.oxx [6000203200024] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Activity exposed to stormwater (identify needed mainteance or a description of correcent).  Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.  Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.  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.  Locations and sources of run-on to the site: 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 operating)? If "No" describe.  Loaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.  Leaks and s	EnviroSoxx w/ MetalLoxx [6000203200024] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  ctivity exposed to stornwater (identify needed mainteance or a description of corrective actions ont).  Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.  Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.  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.  Uutdoor 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.  Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.  Bust generation and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.  Bust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.  Bust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.  Housekeeping (Industrial materials/residues/tra	EnviroSoxx wi MetalLoxx (50002320023) Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  EnviroSoxx wi MetalLoxx (500020320024) Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Citivity exposed to stormwater (identify needed mainteance or a description of corrective actions in referch).  Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.  Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.  Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.  Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.  Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Fuelling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Coultdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Fuelling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Fuelling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Fuelling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Fuelling areas: 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.  Salt storage piles or pile containing salt: controls a	EnviroSoxx w/ MetalLoxx (500023200023) Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.    Control Measure   Control Measure

Signature / Name  Date  Signature / Name  Onfirm the information as recorded is true, accurate and complete.	Date
CERTIFICATION STATEMENT	
rtify under penalty of law that this document and all attachments were prepared under my dividence with a system designed to assure that qualified personnel properly gathered and evaluded on my inquiry of the person or persons who manage the system, or those persons directly responses to the system.	ated the information submit

"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 Fore.	GL DESH-UES
Signature: Russell Stra	Date: 8/19/2019

### Work Order MSGP-RI-63948

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

Mainten	ance Details				
Request	ed: 9/13/2019 3:21:17 PM Target: 9/30/2019 MSGP Pr	ogram			
	re: MSGP Routine Facility Inspection (EPC-CP-Form- 1020.2)  Priority/Type: Normal / Inspection Department: Utilities and Infrastructure  TA-60 MR				
Project:	Routine Facility Inspections September 2019 (P-MSGP-RI- 5401)  Contact: Phone: September 2019 (P-MSGP-RI- Suph				
Reason:	2019 September Inspections 8:05 a.m.				
Tasks					
#	Description	Meas.	No	N/A	Yes
Weather	r Information				
20	Describe the weather at time of inspection and document the temperature (F°).			厂	
Within t	he Facility Boundary				
40	Is the facility free of new discharges of pollutants that have occurred since the last inspection? If		_	_	-/
<u>40</u> 50	"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.	_	-		-/
00	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If				
70	"No" describe.				<u> </u>
	nspection (identify needed maintenance and repairs, failed control measures that need replace ve actions in relevant task comment)	ement, c	or a des	criptio	n of
90	Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.				<b>F</b> /
100	Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.		Г	F	<u> </u>
110	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.		П		<u></u>
120	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No" describe.				<u></u>
	Measures (identify needed maintenance and repairs, failed control measures that need replace ve actions in relevant task comments).  Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	ment, or	a desc	ription	of
150	Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			Г	E/
160	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	Г	E/
170	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	Г	<b>F</b>
180	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	П	<b>D</b>
	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	Г	1
200	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	П	<b>F</b>
210	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			П	
	Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				F
230	Retention Pond [6000211010009] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			П	F/
240	Drop Inlet with Floc logs [6000209030018] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				P
	EnviroSoxx w/ MetalLoxx [6000203200023] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				F/

260	EnviroSoxx w/ MetalLoxx [6000203200024] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	<b>F</b> /
Area/A	activity exposed to stormwater (identify needed mainteance or a description of corrective actions in Material loading/unloading and storage areas: controls adequate (appropriate, effective, and	relevant ta	sk con	ıment)
280	operating)? If "No" describe.			F/
290	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.			
300	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.		_F/	
310	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.		_F/	
320	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		_5⁄	
330	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		_5⁄	<u></u>
340	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u>_</u>	
350	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u></u> [/	
360	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.			_5⁄
370	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			
380	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.		_⊏∕	
390	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		_⊏∕	
100	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.		_F_	
110	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If  "No" describe.		_F⁄	
120	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.			F
430	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.			
Non-C	ompliance			
150	Free of incidents of observed non-compliance not already identified above? If "No" describe.			_5⁄
Additio	onal Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe additional			
470	control measures needed.			_⊏∕
abor				
_abor		Hrs OT Hi	rs Oth	ier Hrs
_eonar	d Sandoval 9/13/2019 / 1		-,	
abor F	Report			
Compl	eted:			
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1	Signature (Name		D-4:	
confir	Signature / Name / Date Signature / Name		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:	Russel Fore	GL DESH-UIS	
Signature:	Run Ol Fer	Date: 5/30/2019	

**Maintenance Details** 

### Work Order MSGP-RI-64023

MSGP Routine Inspection Printed 10/14/2019 - 10:38 AM

•	d: 10/14/2019 10:34:58 AM  Target: 10/31/2019  ■ MSGP Routine Facility  Inspection (EPC-CP-Form-  Department: Utilities and Infrastructure  TA-60 M	9			
	1020.2)	I			
_ast PM: Project:	Routine Facility Inspections October 2019 (P-MSGP-RI- 5410)  Contact: Phone:	ρh			
Reason:	2019 October Inspections 8:28 a.m.				
asks					
# 1	Description	Meas.	No	N/A	Yes
Weather	Information				
20 [	Describe the weather at time of inspection and document the temperature (F°).				<u>_</u> [_
Within th	e Facility Boundary				
1	is the facility free of new discharges of pollutants that have occurred since the last inspection? If 'Failed' describe.		г	г	<b>E</b> /
50	If "No" has a CAR been previously initiated for this new discharge?		Г	7	F
	s the facility free of discharge of pollutants at the time of inspection? If "No" describe,		Г	Г	F
	s the facility free of evidence of, or the potential for, pollutants entering the drainage system. If				
70	'No" describe.				
correctiv	spection (identify needed maintenance and repairs, failed control measures that need rep e actions in relevant task comment) Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.	lacement,	orado	escripti	on of
	Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.		П		1/
	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.				F/
	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No" describe.			工	
Control N	Measures (identify needed maintenance and repairs, failed control measures that need rep	lacment,	or a de	scriptio	on of
	e actions in relevant task comments).				
140	Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				
	Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		_	г	Г/
	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe				
	condition & need for Maintenance, Repair, or Replacement.				_ [ _
	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				
180 8	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	Г	
190 8	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				
200 (	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Б		<u>_</u> F⁄
210 0	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г		
220	Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		. Г.		_5⁄
230	Retention Pond [6000211010009] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	Г	<u>_</u>
	Drop Inlet with Floc logs [6000209030018] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				F
aen i	Environ State and the state of the control of the c				

_	describe condition a need for Maintenance, Repair, or Replacement.	
260	EnviroSoxx w/ MetalLoxx [6000203200024] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	E E E/
Area/A	activity exposed to stormwater (identify needed mainteance or a description of corrective action	ons in relevant task
comme	,	
280	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)?	
290	If "No" describe.	
300	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.	
310	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.	
320	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
330	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	г 🗸 г
340	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
350	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
360	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	
370	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
380	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	
390	operating)? If "No" describe.  Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and	
400	operating)? If "No" describe.  Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)?	
410	If "No" describe.  Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls	
420	adequate (appropriate, effective, and operating)? If "No" describe.	
430	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	
Non-Co	ompliance	
450	Free of incidents of observed non-compliance not already identified above? If "No" describe.	
Additio	onal Control Measures	
470	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional	
470	control measures needed.	
-		
abor		
Labor	Assigned Work Date	Reg Hrs OT Hrs Other Hrs
	d Sandoval 10/14/2019 / 1	
ahar E	Report	
יוטעמ	<b>Nepolt</b>	
Comple	eted:	
Report		
Or	indicate the part of the form the control of	Liston mand , soci
Clas	and got it a varying trick. The Metalloto, Jattles, I F	2000-CALL LEVE
915	o replaced at the month of the Concrete retention pand t	antopot the diso
In	ets that discharge to the MSGP sampler.	
1		
	Signature / Name   Date   Signature / Name	Dete
confirr	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".

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

Print name and title: Revosell Stone GL DESTE-UES

Signature: Date: 10/21/2019

Date: 10/21/2019

Diving the inspection all of the metal for very cle bins assite was empty.

**Maintenance Details** 

### Work Order MSGP-RI-64097

MSGP Routine Inspection Printed 11/7/2019 - 11:03 AM

Reques	ted: 11/7/2019 10:58:22 AM Target: 11/30/2019 🔄 MSGF	Program			
Proced	ure: MSGP Routine Facility Priority/Type: Normal / Inspection 육 RG12				
	Inspection (EPC-CP-Form- Department: Utilities and Infrastructure TA-60	MRF			
Last PN	11/2/2019				
Project	Contact				
,	November 2019 (P-MSGP-				
	RI-5418) Jind-Less than 5 m	ph			
Reason	: 2019 November Inspections	)			
	9:06 a.m.				
Tasks -					
#	Description	Meas.	No	N/A	Yes
Weathe	er Information				
20	Describe the weather at time of inspection and document the temperature (F°).			П	E/
\M/ithin	· ·				
***************************************	the Facility Boundary  Is the facility free of new discharges of pollutants that have occurred since the last				
40	inspection? If "Failed" describe.		П	_	F/
50	If "No" has a CAR been previously initiated for this new discharge?		F		
60	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.				<u> </u>
	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 ne	ed replace	ement.	or a	
descrip	tion of corrective actions in relevant task comment)		,,,,,		
90	Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.				_F_
100	Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.				_F_
110	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.				F/
400	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No"				_
120	describe.				
Control	Measures (identify needed maintenance and repairs, failed control measures that ne	ed replace	nent, c	or a	
descrip	tion of corrective actions in relevant task comments).				
140	Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		-	_	_/
140	Gravel Bags [6000203100008] Control Measure is operating effectively? If "No"				
150	describe condition & need for Maintenance, Repair, or Replacement.			Г	_
	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe				
160	condition & need for Maintenance, Repair, or Replacement.				<u> F</u>
470	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No"				
170	describe condition & need for Maintenance, Repair, or Replacement.				
180	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		_	_	-/
100	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe				
190	condition & need for Maintenance, Repair, or Replacement.		п	П	<b>F</b> /
	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No"				
200	describe condition & need for Maintenance, Repair, or Replacement.				_5_
0.45	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No"				
210	describe condition & need for Maintenance, Repair, or Replacement.				
220	Trench Drain [6000209040001] Control Measure is operating effectively? If "No"		_	,	_/
230	describe condition & need for Maintenance, Repair, or Replacement.		+	4	<del></del>
230	Retention Pond [6000211010009] Control Measure is operating effectively? If "No"				I

bor F	Report				
abor eonard	d Sandoval Assigned Work Date	Reg Hrs	OT Hr	s Oth	er Hı
bor					
70	additional control measures needed.		工		_⊏
dditio	onal Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe				
<b>on-C</b> o	ompliance Free of incidents of observed non-compliance not already identified above? If "No"describe		Į.		
30	describe.			_F⁄	
20	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"	x Repor	+5/	Г	上
10	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	(-1	工	<u></u>	<u></u>
00	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	_F_	
90	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.			_F/	<u></u>
80	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г		<u></u>
70	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			<u></u>	
50 50	and operating)? If "No" describe.  Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.			_ <u>F</u>	드
10	describe.  Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective,				上 ′ _
30	and operating)? If "No" describe.  Fueling areas: controls adequate (appropriate, effective, and operating)? If "No"				上 ′_
20	effective, and operating)? If "No" describe.  Equipment operation and maintenance areas: controls adequate (appropriate, effective,				工
10	and operating)? If "No" describe.  Industrial processing and finished product storage areas: controls adequate (appropriate,	-	_ <u></u> _		_ <u></u>
00	and operating)? If "No" describe.  Liquid tank storage/secondary containment: controls adequate (appropriate, effective,			_F/	
90	operating)? If "No" describe.  Product/chemical storage areas (raw material): controls adequate (appropriate, effective,				_ <u> </u> -
80	and operating)? If "No" describe.  Transfer areas for substances in bulk: controls adequate (appropriate, effective, and	_	<u></u>		_F
omme	Material loading/unloading and storage areas: controls adequate (appropriate, effective,	ve actions	s in rel	evant 1	ask
60	"No" describe condition & need for Maintenance, Repair, or Replacement.				_⊏
50	EnviroSoxx w/ MetalLoxx [6000203200025] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  EnviroSoxx w/ MetalLoxx [6000203200026] Control Measure is operating effectively? If				_⊏

some entared into the	MOGP Wacking	tenceline that is a har database as CAR# 1640.	
			2
- 1711			
Deared F. Sandalal	11/12/2019 9:30 a.		
Signature / Name nfirm the information as recorded	Date	Signature / Name	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 Fore GC	DESH-UZS
Signature: Russell For	Date: 11/13/2019

#### Work Order MSGP-RI-64129

MSGP Routine Inspection Printed 12/10/2019 - 10:01 AM

Within the Facility Boundary  Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe.  If "No" has a CAR been previously initiated for this new discharge?  Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.  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  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 (029) Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If  "No", describe.  Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No" describe.  Control Measures (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comments).  Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Gravel Bags [600020310003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Eco-Block [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Charnel (Maintenance,	Mainte	enance Details				
Weather Information  20 Describe the weather at time of inspection and document the temperature (F*).  Within the Facility Boundary  Is the facility fee of new discharges of pollutants that have occurred since the last inspection? If  Failed" describe.  11"No" has a CAR been previously initiated for this new discharge?  12" In "No" describe.  13" In "No" describe of discharge of pollutants at the time of inspection? If "No" describe.  14" No" describe.  15" Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If  16" No" describe.  17" No" describe.  18" No" describe.  19" No" describe.  19" No" describe.  10" Nonitored Outfall (291 Free of Evidence of Erosion? If "No", describe.  10" Monitored Outfall (292) Free of Evidence of Erosion? If "No", describe.  10" Monitored Outfall (292) Free of Evidence	Proced Last P Projec	M: 11/12/2019 12 19 2019 Temp. 19°F Unigh of 57°F  t: Routine Facility Inspections December 2019 (P-MSGP-RI-5424)  Priority/Type: Normal / Inspection Department: Utilities and Infrastructure  Utilities and Infrastructure  Contact: Phone:	)			
Weather Information  20 Describe the weather at time of inspection and document the temperature (F*).  Within the Facility Boundary  Is the facility fee of new discharges of pollutants that have occurred since the last inspection? If  Failed" describe.  11"No" has a CAR been previously initiated for this new discharge?  12" In "No" describe.  13" In "No" describe of discharge of pollutants at the time of inspection? If "No" describe.  14" No" describe.  15" Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If  16" No" describe.  17" No" describe.  18" No" describe.  19" No" describe.  19" No" describe.  10" Nonitored Outfall (291 Free of Evidence of Erosion? If "No", describe.  10" Monitored Outfall (292) Free of Evidence of Erosion? If "No", describe.  10" Monitored Outfall (292) Free of Evidence	'acko					
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  "Falled" describe.  If "No" has a CAR been previously initiated for this new discharge?  If "No" has a CAR been previously initiated for this new discharge?  If "No" has a CAR been previously initiated for this new discharge?  If "No" describe.  It 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  "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 [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If  "No", describe.  Control Measures (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comments).  Asphalt Bern [5000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Gravel Bags [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [60002040600097] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [60002040600097] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [60002040600097] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Chaen Bags (60002041000097] Control Measure is operating effectively? If "No" describe c	asks					
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  "Falled" describe.  If "No" has a CAR been previously initiated for this new discharge?  If "No" has a CAR been previously initiated for this new discharge?  If "No" has a CAR been previously initiated for this new discharge?  If "No" describe.  It 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  "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 [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If  "No", describe.  Control Measures (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comments).  Asphalt Bern [5000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Gravel Bags [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [60002040600097] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [60002040600097] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [60002040600097] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Chaen Bags (60002041000097] Control Measure is operating effectively? If "No" describe c	#	Description	Meas.	No	N/A	Yes
Within the Facility Boundary  Is the facility free of new discharges of pollutants that have occurred since the last inspection? If  "Falied" describe.  If "No" has a CAR been previously initiated for this new discharge?  If "No" has a CAR been previously initiated for this new discharge?  If "No" has a CAR been previously initiated for this new discharge?  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  "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 [029] Five of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Five of Evidence of Pollutants in Discharges and/or Receiving Water? If  "No", describe.  Control Measures (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comments).  Control Measures (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comments).  Condition & need for Maintenance, Repair, or Replacement.  Gravel Bags [6000203100003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Repair or Replacement.  Repair or Replacement.  Tench Orain [6000204060007] Control Measure is operating effectively? If "No" descri	Weath	er Information				
Within the Facility Boundary  Is the facility free of new discharges of pollutants that have occurred since the last inspection? If  "Falled" describe.  I "No" has a CAR been previously initiated for this new discharge?  Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.  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  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 [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If  No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If  No", describe.  Control Measures (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comments).  Asphat Berm [8000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Gravel Bags [8000203110008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Channel/Swale [8000203400004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [8000203400000] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [8000203400000] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [8000204080007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	20				П	-
Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Falled" describe.  If "No" has a CAR been previously initiated for this new discharge?  If "No" has a CAR been previously initiated for this new discharge?  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 "No" describe occurred to describe.  Dutfall Inspection (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comment)  Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No" describe.  Control Measures (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comments).  Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Gravel Bags [6000203100003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [600020466006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204660007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Check Dam [6000206100007] Control Measure is operating effectively? If "No"						
Falled' describe.	vvitnii	·				
Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.	40			. п	П	<b>~</b>
Is the facility free of evidence of, or the potential for, poliutants entering the drainage system. If "No" describe.    Page	50	If "No" has a CAR been previously initiated for this new discharge?			<u></u>	
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 [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  Control Measures (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comments).  Asphalt Berm [6000203400011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Check Dam [600020610005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Check Dam [600020610005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Retention Pond	60	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.				
Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.  Monitored Outfall [029] 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 [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Check Dam [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Check Dam [60002040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Retention Pond [6000211010009] Control Measure is operating effectively? If "No" describe	70				Г	F/
Monitored Outfall [029] 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 [600020340011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Check Dam [600020400005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Retention Pond [6000211010009] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Drop Inlet with Floc logs [600020930018] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If				<u>-/</u>
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describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Retention Pond [6000211010009] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Retention Pond [6000211010009] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Drop Inlet with Floc logs [6000209030018] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	160					
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condition & need for Maintenance, Repair, or Replacement.  Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Retention Pond [6000211010009] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Drop Inlet with Floc logs [6000209030018] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	200	condition & need for Maintenance, Repair, or Replacement.				_5/
condition & need for Maintenance, Repair, or Replacement.  Retention Pond [6000211010009] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Drop Inlet with Floc logs [6000209030018] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	210	condition & need for Maintenance, Repair, or Replacement.		П		
230 condition & need for Maintenance, Repair, or Replacement.  Drop Inlet with Floc logs [6000209030018] Control Measure is operating effectively? If "No"  describe condition & need for Maintenance, Repair, or Replacement.	220	condition & need for Maintenance, Repair, or Replacement.			厂	
describe condition & need for Maintenance, Repair, or Replacement.	230	condition & need for Maintenance, Repair, or Replacement.				
	240	describe condition & need for Maintenance, Repair, or Replacement.				<u> </u>

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

250

260	EnviroSoxx w/ MetalLoxx [6000203200026] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	П	Γ	[ <del>-</del> ]
Area/A		in relevant ta	sk con	
280	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	ŢŢ.	_Г_	
290	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.			
300	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.		F/	П
310	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.	Г	F/	
320	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	Г	<u> </u>	
330	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			 1п
340	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u></u>	
350	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			
360	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.		F	
370	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		- <u>-</u> -	
380	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.			, L
390	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.			
400	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u> </u>	
410	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	<u> </u>	F/	
420	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	Den At		
430	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.		<b>D</b>	
Non Co	ompliance			
450	Free of incidents of observed non-compliance not already identified above? If "No" describe.			F/
<b>Additio</b> 470	onal Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.			
770	Control measures needed.			
abor				
Labor	Assigned Work Date Re	g Hrs OT Hr	s Oth	er Hrs
Leonard	d Sandoval 12/10/2019 / 1			
abor R	Report	6 11		
Comple	eted: Holf Dheelar of Ercot hepen for inspection which is considered an annual	limped	ian.	
Report:	redded paper on the grand next to a Voll-off bin in the co	nterof	the	And
Koil	-off bin #6267 Cartaining metal for variety was missing proved into the MSSP facting allabors as CAR# 1682.	Aund	ito	abo
1	Signature / Name   Date   Signature / Name		Date	
confirm	n 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: Plus sell	Home GL DESH-UES	
0 00-		
Signature: Luxull Str	Date: 1/6/2020	_

### Work Order MSGP-RI-64137

MSGP Routine Inspection Printed 1/7/2020 - 4:13 PM

Mainte	enance Details —	
Last P Projec		am
Tooks	<b>6.35 6.0</b>	
Tasks		
#	Description Meas	s. No N/A Yes
Weath	ner Information	
20	Describe the weather at time of inspection and document the temperature (F°).	
Withir	the Facility Boundary	
	Is the facility free of new discharges of pollutants that have occurred since the last	
40	inspection? If "Failed" describe.	
50 60	If "No" has a CAR been previously initiated for this new discharge?	
00	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.	
90	Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.	
110	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.	
120	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No" describe.	
	ol Measures (identify needed maintenance and repairs, failed control measures that need repletion of corrective actions in relevant task comments).	lacment, or a
140	Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	
150	Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	
160	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	
170	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	
180	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	
190	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	
200	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	
210	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No"  describe condition & need for Maintenance, Repair, or Replacement.	
220	Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	
230	Retention Pond [6000211010009] Control Measure is operating effectively? If "No"	

280 an Tr. 290 op Pr. 300 an Lic 310 an 320 eff Ed. 330 an 360 Ma 350 an 360 Ma 370 op Er. 380 "N Lo 390 an Lo 410 op Ho 420 ad Lo 430 de  Non-Comp Fr. 450 de  Additional Ar	ree of incidents of observed non-compliance not escribe.  I Control Measures re permit requirements satisfied with existing conditional control measures needed.	effective, and operating) of already identified above ontrol measure(s)? If "No	e? If "No" describe	T T	F Hrs
280 an Tr. 290 op Pr. 300 an Lic 310 an Inc 320 eff. 340 de 350 an 360 Mi 370 op Er. 380 "N Lo 390 an Sa 400 op Ho 420 ad Lee 430 de Non-Comp 450 de Additional Ar 470 ad Leonard Sa	perating)? If "No" describe.  ust generation and vehicle tracking: controls adperating)? If "No" describe.  ousekeeping (Industrial materials/residues/trasldequate (appropriate, effective, and operating)? eaks and spills: controls adequate (appropriate, escribe.  oliance  ree of incidents of observed non-compliance not escribe.  I Control Measures  re permit requirements satisfied with existing conditional control measures needed.	effective, and operating) of already identified above ontrol measure(s)? If "No"	e? If "No" describe	T T	F/
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Mail	perating)? If "No" describe. ust generation and vehicle tracking: controls ad perating)? If "No" describe.	h in contact with stormwa	iter); controls		
omment).           80         an           Fr         90         op           Pr         00         an           Lic         ln         en           10         an         en           20         eff         en           30         an         en           40         de         op           50         an         en           70         op         en           80         "N         en           90         an         en           00         op         op	perating)? If "No" describe.	ioquate (appropriate, elle			Į.
Min   Min	all allegate and a control of the co			_ <u> </u>	Г
omment).           80         ar           Fr         90         op           10         ar         ln           20         ef         ef           30         ar         Fu           40         de         op           50         ar         ef           60         Ma         w           70         op         er           80         "N	ocations and sources of run-on to the site: contr nd operating)? If "No" describe.				
omment).           80         an           Tr         90         op           90         an         Lic           10         an         Lic           10         an         Ec           30         an         Fu           40         de         Ou           50         an         W           60         Mis           70         op	rodible areas/construction: controls adequate (a			L P	Γ
omment).           80         an           Fr         90         op           10         an         lin           20         ef         ef           30         an         Fu           40         de         Ou           50         an         an	/aste handling and disposal areas: controls ade perating)? If "No" describe.			_ F _ F	Г
Mail	nd operating)? If "No" describe. lachinery: controls adequate (appropriate, effec	tive, and operating)? If "N	lo" describe.		<b>~</b>
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M: 80 an Tr 90 op 00 an Lic 10 an 10 eff	quipment operation and maintenance areas: co nd operating)? If "No" describe. ueling areas: controls adequate (appropriate, ef				П
omment).  80 an Tr 90 op Pr 00 an	floustrial processing and finished product storag ffective, and operating)? If "No" describe. quipment operation and maintenance areas: co			<u> </u>	Г
omment).  80 ar  7r. 90 op  Pr. 00 ar	iquid tank storage/secondary containment: cont nd operating)? If "No" describe. idustrial processing and finished product storag			<u> </u>	Г.
omment). Ma 80 an Tr	roduct/chemical storage areas (raw material): c nd operating)? If "No" describe.			F	Г
omment). Ma	ransfer areas for substances in bulk: controls ac perating)? If "No" describe.	dequate (appropriate, effe	ective, and	ГР	П
POOLA -4:	vity exposed to stormwater (identify needed i. laterial loading/unloading and storage areas: cond operating)? If "No" describe.				sk F⁄
60 <u>"N</u>	No" describe condition & need for Maintenance,	Repair, or Replacement.			<u> </u>
250 "N	nviroSoxx w/ MetalLoxx [6000203200025] Co No" describe condition & need for Maintenance, nviroSoxx w/ MetalLoxx [6000203200026] Co	Repair, or Replacement.			F/
40 "N	rop Inlet with Floc logs [6000209030018] Con No" describe condition & need for Maintenance,	Repair, or Replacement.			F/

*Not: I	Te in car	vet vetent	ion pand.	4	v
	re / Name mation as recorded	Date	8:5러a. <u></u> and complete.	Signature / Name	Date
		CERTIFI	CATION STAT	TEMENT	
ccordance with a sys Based on my inquiry nformation, the infor	tem designed to ass of the person or per mation submitted is	ture that qualified sons who manage , to the best of my	personnel properties the system, or you knowledge and	e prepared under my direction of erly gathered and evaluated the those persons directly responsibe d belief, true, accurate, and com- ne possibility of fine and impris	information submitted. ble for gathering splete. I am aware that
Signatory must meet defin	nition in Section B.11.A,	eg. FOD, Ops Mgr, D	ESH Group Leader	; EPC Group Leader)	
rint name and title:_	Russell &	Stone Go	DESH-4	t±S	

Signature: Date: 1/21/2020

### Work Order MSGP-64147

MSGP Monitoring Stations Printed 2/10/2020 - 10:24 AM

lainte	enance Details				
Reque	sted: 2/10/2020 10:21:07 AM Target: 2/29/2020 🚉 MSGP Pr	ogram			
roced	dure: MSGP Routine Facility Inspection (EPC-CP-Form- 1020.2)  Priority/Type: Normal / Inspection  □ Fig. 12.9  Priority/Type: Normal / Inspection □ Fig. 12.9  □	RF			
ast P	2/10/2020				
Projec	t: Routine Facility Inspections February 2020 (P-MSGP-RI- 5426)  Contact: Phone:				
Reaso	n: 2020 February Inspections 9:30 a.m.				
	7.50 a.m.				
asks					
#	Description	Meas.	No	N/A	Yes
Weath	ner Information				
20	Describe the weather at time of inspection and document the temperature (F°).		Г		<b>F</b> /
Aliabi.					
	Is the facility Boundary  Is the facility free of new discharges of pollutants that have occurred since the last inspection? If		_	_	
40 50	"Failed" describe.	_	는	-/	1
50 50	If "No" has a CAR been previously initiated for this new discharge?  Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.			~	+
50	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No"				
70	describe.		υП		_F′
	Il Inspection (identify needed maintenance and repairs, failed control measures that need replac	ement, or	a desc	ription	of
correc 90	ctive actions in relevant task comment)  Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe,				
100	Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.				
110	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.				
120	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No" describe.	-	-		-
	ol Measures (identify needed maintenance and repairs, failed control measures that need replacetive actions in relevant task comments).  Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	ment, or a	descr	iption o	f 
150	<b>Gravel Bags [6000203100008]</b> Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<u></u>		_F_
160	<b>Eco-Block [6000203110003]</b> Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				_5
170	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				_=
180	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г_		_=
190	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				
200	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				[·
210	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				
220	<b>Trench Drain [6000209040001]</b> Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				_F/
230	Retention Pond [6000211010009] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				
240	Drop Inlet with Floc logs [6000209030018] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				
250	EnviroSoxx w/ MetalLoxx [6000203200025] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				F
260	EnviroSevy w/ Metall evy [6000202200026] Central Measura is apprating effectively2 If "No"				

	describe condition & need for Maintenance, Repair, or Replacement.				_
Area/A	ctivity exposed to stormwater (identify needed mainteance or a description of corrective action	ns in relevan	t task	comm	ent).
280	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	<u></u>	_F′
290	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.		г	F/	ſ_
300	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.		г	F	-
310	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.		г	-	-
320	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		г	-	
30	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г		, 
40	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u></u>	F	Г
350	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe,		г		
860	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.		_	Г	[J
370	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		г	F	· r
380	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.		г	F	r
390	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		г		Г
100	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.		г	0	Г
110	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.		г_	<b>D</b>	r
120	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.				.F/
430	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.		厂.	<u> </u>	Г
Non-C	ompliance				
150	Free of incidents of observed non-compliance not already identified above? If "No" describe.		Г.	Г.	<u></u>
Additic	onal Control Measures				
470	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.		厂	<u></u>	<u> </u>
	-		-		
abor					
				Oth	er Hrs
Labor	Assigned Work Date	Reg Hrs	OT Hrs	Out	
	d Sandoval Assigned Work Date	Reg Hrs	OT Hrs		
_eonar	d Sandoval 2/10/2020 / 1	Reg Hrs	OT Hrs		
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_eonar	2/10/2020 / 1	Reg Hrs	L L		to to

"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:	Plussell Stone	UT GZ			
Signature: Re-	all Str		Date:	2/18/2020	

### Work Order MSGP-RI-64158

MSGP Routine Inspection Printed 3/2/2020 - 11:02 AM

wame	enance Details				
Proce Last F Projec	Priority/Type: Normal / Inspection Inspection (EPC-CP-Form- 1020.2) PM: 2/18/2020 3 17 2020 7 2000 Utilities and Infrastructure	60 MRF			i
rtouoc	7:56a.m.				
Гasks					
#	Description	Meas.	No	N/A	Yes
Weatl	her Information				
20	Describe the weather at time of inspection and document the temperature (F°).		Г	г	
\A/i4bi					<u> </u>
vvitriii	n the Facility Boundary  Is the facility free of new discharges of pollutants that have occurred since the last				
40	inspection? If "Failed" describe.				-
50	If "No" has a CAR been previously initiated for this new discharge?		F	-	<u> </u>
60	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.			Г	-
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage				
70	system. If "No" describe.				
90 100	Il Inspection (identify needed maintenance and repairs, failed control measures that ne rective actions in relevant task comment)  Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe		<u></u>		1
110	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.				
120	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No" describe.				<u></u>
Contr	ol Measures (identify needed maintenance and repairs, failed control measures that ne	ed replacme	ent, or a	descr	iption
of cor	rective actions in relevant task comments).				
140	Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	e — ————			
150	Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				<u></u>
160	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				
170	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				F
180	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				
190	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		П		[ <del>-</del>
200	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Γ.	V 100	
210	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				F/
220	Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			Г	
230	Retention Pond [6000211010009] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	Г	
240	Drop Inlet with Floc logs [6000209030018] Control Measure is operating effectively? If				-

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"No" describe condition & need for Maintenance,	Repair, or Replacement	t				
ctivity exposed to stormwater (identify needed rent).	mainteance or a descr	iption of corrective	e actions i	n releva	nt tas	k
,	ntrols adequate (approp	riate, effective,		П	П	
Transfer areas for substances in bulk: controls ad operating)? If "No" describe.	equate (appropriate, eff	fective, and		Г		-
Product/chemical storage areas (raw material): co	ontrols adequate (appro	priate, effective,	-	F	-/	,
Liquid tank storage/secondary containment: contr	ols adequate (appropria	ate, effective, and			-/	-
Industrial processing and finished product storage	e areas: controls adequa	ate (appropriate,		F	-/	-
Equipment operation and maintenance areas: cor	ntrols adequate (approp	riate, effective, and			-/	-
	ective, and operating)?	If "No" describe.				Г
						1
	ive, and operating)? If "I	No" describe.		F	П	P
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Salt storage piles or pile containing salt: controls a operating)? If "No" describe.	adequate (appropriate, e	effective, and		П	[/	П
Dust generation and vehicle tracking: controls ade operating)? If "No" describe.	equate (appropriate, effe	ective, and		Г		
Housekeeping (Industrial materials/residues/trash adequate (appropriate, effective, and operating)?	in contact with stormwa	ater): controls		Γ.		
Leaks and spills: controls adequate (appropriate, edescribe.	effective, and operating)	)? If "No"		Г		
mnliance						
•	already identified above	e? If "No"		П	<b>-</b>	<b>~</b>
nal Control Measures						
	ntrol measure(s)? If "No	" describe				P
Sandoval		Work Date	Reg Hrs	OT Hrs	Othe	er Hr
				-		
	E/ES/ESEO / 1					
eport						
ted:						
	EnviroSoxx w/ MetalLoxx [6000203200025] Co "No" describe condition & need for Maintenance, EnviroSoxx w/ MetalLoxx [6000203200026] Co "No" describe condition & need for Maintenance, ctivity exposed to stormwater (identify needed in the control of	EnviroSoxx w/ MetalLoxx [6000203200026] Control Measure is operati "No" describe condition & need for Maintenance, Repair, or Replacement EnviroSoxx w/ MetalLoxx [6000203200026] Control Measure is operati "No" describe condition & need for Maintenance, Repair, or Replacement tivity exposed to stormwater (identify needed mainteance or a describt).  Material loading/unloading and storage areas: controls adequate (appropriate, effoperating)? If "No" describe.  Transfer areas for substances in bulk: controls adequate (appropriate, effoperating)? If "No" describe.  Product/chemical storage areas (raw material): controls adequate (appropriate)? If "No" describe.  Liquid tank storage/secondary containment: controls adequate (appropriate)? If "No" describe.  Liquid tank storage/secondary containment: controls adequate (appropriate)? If "No" describe.  Industrial processing and finished product storage areas: controls adequate (fective, and operating)? If "No" describe.  Equipment operation and maintenance areas: controls adequate (appropriating)? If "No" describe.  Equipment operation and maintenance areas: controls adequate (approperating)? If "No" describe.  Equipment operation and equipment washing areas: controls adequate (appropriate)? If "No" describe.  Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.  Erodible areas/construction: controls adequate (appropriate, effective, an "No" describe.  Erodible areas/construction: controls adequate (appropriate, effective, an operating)? If "No" describe.  Erodible areas/construction: controls adequate (appropriate, effective, an operating)? If "No" describe.  Balt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.  Balt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.  Heaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.  Free of incidents of observed non-complian	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.  Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.  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.  Industrial processing and finished product storage areas: 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.  Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.  Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.  Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.  Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.  Erodible areas/construction: 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.  Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.  Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.  Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.  Assigned Work Date  Sandoval Assigned Work Date  Assigned Work Date	EnviroSoxx w/ MetalL.oxx [6000203200025] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	EnviroSoxx w/ MetalLoxx [5000203200025] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  EnviroSoxx w/ MetalLoxx [5000203200026] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  EnviroSoxx w/ MetalLoxx [5000203200026] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  EnviroSoxx w/ MetalLoxx [5000203200026] Control Measure is operating effectively? If "No" describe.  In the state of	EnviroSoxx w/ MetalLoxx [600023200025] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  EnviroSoxx w/ MetalLoxx [600023200026] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  City (exception of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions in relevant tast that the control of corrective actions actions action to controls action to action and corrective, and operating? If "No" describe.  Fueling areas: controls action provide, effective, and operating? If "No" describe.  Fueling areas: controls action actions acti

777	24		
Signature / Name	3/17/2020 8:20am	Signature / Name	Date
I confirm the information as recorded		te.	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: William Reed DE	SH-UIS Group Leader (acting)
Signature: Callan & Oceal	Date: 3/18/2020  The them whildle before the end of the the ares at the three dop inlets that
On 3/10/2020 Flor Lors were ordered to	the arcs at the three dop inlets that
discharge to the KISGP Sampler.	

Maintenance Details

#### Work Order MSGP-RI-64212

MSGP Routine Inspection Printed 4/7/2020 - 5:40 PM

Proced Last P Projec	The last the contract	9			
	8:07a.m.				
asks					
#	Description	Meas.	No	N/A	Yes
Weath	ner Information				
20	Describe the weather at time of inspection and document the temperature (F°).				F
Withi	n the Facility Boundary				
	Is the facility free of new discharges of pollutants that have occurred since the last inspection? If				,
40	"Failed" describe.			Г,	P
50	If "No" has a CAR been previously initiated for this new discharge?		- <u>Г</u>		
60	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.				
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.		Г	Б	<b>~</b>
90 100	Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.		t	F	5
110	<b>Monitored Outfall [029]</b> Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.				E/
120	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No" describe.				
	ol Measures (identify needed maintenance and repairs, failed control measures that need repetive actions in relevant task comments).  Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe	lacment,	or a des	scriptio	on of
150	condition & need for Maintenance, Repair, or Replacement.  Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe	_	;		<u> </u>
160	condition & need for Maintenance, Repair, or Replacement.			П	_F_
170	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	Л	_⊏∕
180	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				
190	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				_5⁄
200	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				_5_
210	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		П.		_5/
220	Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		П		_F/
230	Retention Pond [6000211010009] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			16	_F/
240	Drop Inlet with Floc logs [6000209030018] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г		_F_
250	EnviroSoxx w/ MetalLoxx [6000203200025] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement				<b>F</b> /

260	EnviroSoxx w/ MetalLoxx [6000203200026] Control Medescribe condition & need for Maintenance, Repair, or Re	easure is operating e	effectively? If "No"		г	г г/
Area/A	ctivity exposed to stormwater (identify needed maintea		on of corrective ac	tions in re	levant ta	sk
280	Material loading/unloading and storage areas: controls ac operating)? If "No" describe.	dequate (appropriate	e, effective, and		г	Г г/
290	Transfer areas for substances in bulk: controls adequate If "No" describe.	(appropriate, effecti	ve, and operating)?			
300	Product/chemical storage areas (raw material): controls a operating)? If "No" describe.	adequate (appropria	te, effective, and		<u> </u>	F/ F
310	Liquid tank storage/secondary containment: controls adec operating)? If "No" describe.	quate (appropriate,	effective, and			Б/ П
320	Industrial processing and finished product storage areas: effective, and operating)? If "No" describe.	controls adequate (	appropriate,		Г	Г
330	Equipment operation and maintenance areas: controls ad operating)? If "No" describe.	lequate (appropriate	e, effective, and		Г	
340	Fueling areas: controls adequate (appropriate, effective, a	and operating)? If "N	In" describe		Ė	
350	Outdoor vehicle and equipment washing areas: controls a operating)? If "No" describe.			-		
360	Machinery: controls adequate (appropriate, effective, and	operating)2 If "No"	dosoribo			<del>-</del> -/
370	Waste handling and disposal areas: controls adequate (al "No" describe.					
380	Erodible areas/construction: controls adequate (appropria describe.	ate, effective, and op	perating)? If "No"			
390	Locations and sources of run-on to the site: controls adeq operating)? If "No" describe.	ηuate (appropriate, ε	effective, and			
400	Salt storage piles or pile containing salt: controls adequat operating)? If "No" describe.	e (appropriate, effec	ctive, and			<b>-</b> /-
410	Dust generation and vehicle tracking: controls adequate ( If "No" describe.	appropriate, effectiv	e, and operating)?			F/ F
420	Housekeeping (Industrial materials/residues/trash in conta adequate (appropriate, effective, and operating)? If "No" of	act with stormwater) describe.	: controls		П	Г.Б
430	Leaks and spills: controls adequate (appropriate, effective	e, and operating)? If	"No" describe.			
Non-Co	mpliance					
150	Free of incidents of observed non-compliance not already	identified above? If	"No" describe			
	nal Control Measures	identified above : If	140 describe.			<u> </u>
470	Are permit requirements satisfied with existing control me control measures needed.	asure(s)? If "No" de	scribe additional		_П	
abor						
_abor		Assigned	Work Date	Reg Hrs	OT Hrs	Other Hrs
eonard.	Sandoval	4/7/2020 / 1	-			-
bor R	enort					
Comple Report:		caked as	ا که خده	1 - 0 -	ra-la	k actia
100	Whees CAR # 1746.		7		1	- CTA
^	7.11					
	Signature / Name / Date		gnature / Name			Date
onfirm	the information as recorded is true, accurate and com	nloto	Surrence / INDITIO		,	Jaic

"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:	Villiam Reed	DESH-UIS	s Group Lead	as Cacting)	
Signatura: /84	Sain W beect	0	Date: 4/20/202		
On 411/2020	the water 4 see	diment from	the carakte	vetentian pard L	ye
Cleaned out	The Metalley	to of the	with Enviv	vetentian pard La 6-Soxx in trant or hat discharge to the	e
MGGP Say	plar was vaplace	ed.	11/2	12020 the Flor Lo	40
Asport of	the vartine Br	MP mainter I discharge	to the MGGP	sampler were als	b
at the 3 a	dup inters the			12020 the Floc Lo sampler was als	

**Maintenance Details** 

### Work Order MSGP-RI-64298

MSGP Routine Inspection Printed 5/12/2020 - 5:17 PM

-	sted: 5/12/2020 5:12:05 PMTarget:5/31/2020MSGPdure: MSGP Routine Facility Inspection (EPC-CP-Form- Inspection (EPC-CP-Form- Department: Utilities and Infrastructure♣ TA-60 M	.9			
4 BI	1020.2) 5/20/2020 Time (OF Which of 73°F				
Last Pl Projec	Contact				
Reaso	n: 2020 May Inspections				
asks					
#	Description	Meas.	No	N/A	Yes
Weath	er Information				
20	Describe the weather at time of inspection and document the temperature (F°).			_	E/
Within	the Facility Boundary				
40	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.				<del></del>
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.				
/ 0	system. If No describe.				<u> </u>
	I Inspection (identify needed maintenance and repairs, failed control measures that nee ption of corrective actions in relevant task comment)  Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.				_F_
100	Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.				<u>_</u> F_
110	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.				F
120	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No" describe.				_F_
Contro	ol Measures (identify needed maintenance and repairs, failed control measures that nee	d replaci	ment o	га	
	ption of corrective actions in relevant task comments).	p			
140	Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		П	П	
150	Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		П	Г	F/
160	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		п	П	F
170	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	Г	E/
180	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			П	0
190	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	Г	F
200	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	Г	Г
210	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	Г	
	Trench Drain [6000209040001] Control Measure is operating effectively? If "No"				
220	describe condition & need for Maintenance, Repair, or Replacement.				F
230	Retention Pond [6000211010009] Control Measure is operating effectively? If "No"				

	describe condition & need for Maintenance, Repair, or Replacement.			
240	Drop Inlet with Floc logs [6000209030029] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	Г	Г	
250	EnviroSoxx w/ MetalLoxx [6000203200027] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	
60	EnviroSoxx w/ MetalLoxx [6000203200028] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			
omme	Material loading/unloading and storage areas: controls adequate (appropriate, effective,	ns in rel	evant t	ask
80	and operating)? If "No" describe.  Transfer areas for substances in bulk: controls adequate (appropriate, effective, and			<u> </u>
90	operating)? If "No" describe.  Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.		<u></u>	_ <u>_</u> _
10	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.		_ <u></u>	_ <u></u> _
20	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		_ <u>-</u> _	_ <u>_</u> _
30	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<del></del> _	_ <u>-</u> _	<del>_</del> _
40	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	Г	<u>-</u>	
50	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			
60	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	<b>D</b>
70	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	Г		· _
80	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.			
90	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		[-/	<u>^</u> _
00	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.		_=_	<u></u>
10	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u></u> <b>F</b>	Ĺ
20	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.			
30	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" Laborate describe.	+ 1		
lon-Co	mpliance Free of incidents of observed non-compliance not already identified above? If "No"			
50	describe.			_⊏⁄
dditio	nal Control Measures	Lab	~	
70	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.		<u>r</u>	
bor-				
abor eonard	Sandoval Assigned Work Date Reg Hr	s OT Hi	rs Oth	er Hrs
abor R	eport			

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Dresol tod Copper exce	edire from stop	ocas CALIDA LE	13/2020 at Out-
17.			
Signature / Name	5/20/2020 10:4	Signature / Name	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".

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nature:	wellan Y	Oceal	Date:	5/08/2000	_

### Work Order MSGP-RI-64400

MSGP Routine Inspection Printed 6/16/2020 - 1:59 PM

-		Program			
roced	ure: MSGP Routine Facility Priority/Type: / Inspection				
	1020.2) (191200 / OPT 11 - 1 0100	WIKE			
ast Pi	1: 5/20/2020 8/1- 1- 1- 1- 1- 1- 1- 1- 1- 1- 1- 1- 1- 1				
Project	June 2020 (P-MSGP-RI-5447) Trick Hayle of Smoke Contact: Phone:				
Reasor	: MSGP Routine Facility Inspection from the fires in Five and				
	MSGP Routine Facility Inspection From the Ties in 10 mph 10:23 a.m.				
	10:23 a.m.				
asks					
#	Description	Meas.	No	N/A	Yes
Weath	er Information				
20	Describe the weather at time of inspection and document the temperature (F°).	- 0		П	
Within	the Facility Boundary				
	Is the facility free of new discharges of pollutants that have occurred since the last				
40	inspection? If "Failed" describe.		厂	_	P
50	If "No" has a CAR been previously initiated for this new discharge?	-	됴		工
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.		_	п	
00	Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.		工		7
	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving				
110	Water? If "No", describe.  Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No"				
120	describe.				
Contro	Measures (identify needed maintenance and repairs, failed control measures that need	replacme	nt, or a	descri	iption
of corr	ective actions in relevant task comments).				
140	Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				[_/
	Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe				
150	condition & need for Maintenance, Repair, or Replacement.				
160	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		m.	г	_
	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No"				
170	describe condition & need for Maintenance, Repair, or Replacement.				
180	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			-	<b>F</b> /
	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe				
190	condition & need for Maintenance, Repair, or Replacement.				
200	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			_	-
	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No"				
210	describe condition & need for Maintenance, Repair, or Replacement.				1
220	Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	<b>F</b>	
	Retention Pond [6000211010009] Control Measure is operating effectively? If "No"				
230	describe condition & need for Maintenance, Repair, or Replacement.				~
240	<b>Drop Inlet with Floc logs [6000209030029]</b> Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Е	<u></u>	
	The state of the s				

250	EnviroSoxx w/ MetalLoxx [6000203200027] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	Г	_	Г	
260	EnviroSoxx w/ MetalLoxx [6000203200028] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		_		
270	EnviroSoxx w/ MetalLoxx [6000203200030] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				<b> </b>
Area// comm	Activity exposed to stormwater (identify needed mainteance or a description of corrective actionent).	ns in re	leva	nt tas	k
290	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		<del>-</del> :	<b>F</b>	_P_
300	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u> </u>	<u></u>	
310	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.		<b>-</b> ;	P/	
320	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.			<u>-/</u>	
330	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			<b>P</b> /	
340	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			_	
350	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		-	<b>L</b>	
360	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		<del>-</del> ,	-	΄.
370	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	Г	7	П	7
380	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	Г	_	<b>-</b>	
390	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	Г		P	
400	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.			P	
410	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.		_	<b>F</b> /	
420	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.			P/	
130	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.				
140	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	Г	_	П	
don-C	ompliance				
160	Free of incidents of observed non-compliance not already identified above? If "No" describe.	r	_	П	<b>-/</b>
			<u>-</u>		
Additi	onal Control Measures				
180	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.		<u> </u>		_F_
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ompl	eted:				
Report			_		
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3	-canalt. Sandala 6/19/2020 11:00a.m.				
confir	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:	William Reed	DESH -UIS	Group Lea	der
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### Work Order MSGP-RI-64482

MSGP Routine Inspection Printed 7/8/2020 - 4:00 PM

Mainte	enance Details			-	
Last P	MSGP Routine Facility Inspection (EPC-CP-Form- 1020.2)  M: 6/19/2020  Priority/Type: Normal / Inspection Department: Utilities and Infrastructure  LOF ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐				
Tasks					
#	Description	Meas.	No	N/A	Yes
	ner Information				
20	Describe the weather at time of inspection and document the temperature (F°).				_F/
	the Facility Boundary  Is the facility free of new discharges of pollutants that have occurred since the last				
40	inspection? If "Failed" describe.		<u> </u>	工	, [
50	If "No" has a CAR been previously initiated for this new discharge?				工
60	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.	_			_F_
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.			П	_F_
Outfa of cor	l Inspection (identify needed maintenance and repairs, failed control measures that need rective actions in relevant task comment)	replacem	ent, or	a desc	ription
90	Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.		П	П	<b>P</b>
100	Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.				
110	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.		П	П	P/
120	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No" describe.		П	П	
Contr	ol Measures (identify needed maintenance and repairs, failed control measures that need rective actions in relevant task comments).	replacme	nt, or a	descr	iption
140	Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		п	П	
150	<b>Gravel Bags [6000203100008]</b> Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				<b>P</b>
160	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		. II	Б	F/
170	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				
180	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				<b>F</b> /
190	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				_
200	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				_=/
210	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				
220	Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				
230	Retention Pond [6000211010009] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				
240	<b>Drop Inlet with Floc logs [6000209030029]</b> Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		. 🗆		F/

250	EnviroSoxx w/ MetalLoxx [6000203200027] Control Mea "No" describe condition & need for Maintenance, Repair, o				_	6	-/
260	EnviroSoxx w/ MetalLoxx [6000203200028] Control Mea "No" describe condition & need for Maintenance, Repair, o	sure is operatir	ng effectively? If				[/
270	EnviroSoxx w/ MetalLoxx [6000203200030] Control Mea "No" describe condition & need for Maintenance, Repair, o				ŧ		
Area/A	ctivity exposed to stormwater (identify needed maintean	ce or a descri	ption of corrective act	ions in r	eleva	ant tas	k
omme	•						
290	Material loading/unloading and storage areas: controls ade and operating)? If "No" describe.				1	п	F/
300	Transfer areas for substances in bulk: controls adequate (a operating)? If "No" describe.				7_	0	
310	Product/chemical storage areas (raw material): controls ad and operating)? If "No" describe.				1	1	П
320	Liquid tank storage/secondary containment: controls adequoperating)? If "No" describe.					P	п
30	Industrial processing and finished product storage areas: c_effective, and operating)? If "No" describe.					F	П
340	Equipment operation and maintenance areas: controls ade operating)? If "No" describe.	quate (appropr	riate, effective, and			P/	, <u> </u>
50	Fueling areas: controls adequate (appropriate, effective, ar	nd operating)?	If "No" describe.		<u> </u>	7	
60	Outdoor vehicle and equipment washing areas: controls acand operating)? If "No" describe.	lequate (appro	priate, effective,		1	P	П
70	Machinery: controls adequate (appropriate, effective, and of	pperating)? If "N	No" describe.		Ti.		
80	Waste handling and disposal areas: controls adequate (apoperating)? If "No" describe.	propriate, effec	tive, and			F	П
90	Erodible areas/construction: controls adequate (appropriate "No" describe.	e, effective, and	d operating)? If			F/	<b>_</b>
00	Locations and sources of run-on to the site: controls adequoperating)? If "No" describe.	iate (appropriat	te, effective, and	0		F/	П
110	Salt storage piles or pile containing salt: controls adequate operating)? If "No" describe.	(appropriate, e	effective, and			0	
20	Dust generation and vehicle tracking: controls adequate (a operating)? If "No" describe.	ppropriate, effe	ective, and			P	
30	Housekeeping (Industrial materials/residues/trash in conta- adequate (appropriate, effective, and operating)? If "No" de		ater): controls				F
40	Leaks and spills: controls adequate (appropriate, effective, describe.	and operating)	)? If "No"			П	F/
Non-Co	ompliance						
	Free of incidents of observed non-compliance not already	identified above	e? If "No"				
60	describe.						
Additio	nal Control Measures						
80	Are permit requirements satisfied with existing control mea additional control measures needed.	sure(s)? If "No	" describe		3		
_	<del>}</del>			÷	-	—	-
bor							
.abor		Assigned	Work Date Re	g Hrs O	T Hr	s Oth	er Hrs
		7/8/2020 / 1	1		_		_
Vheele	r, Holly	7/8/2020 / 1	<del></del>		-		
bor F	Report						
omple	eted:						
Report:							

Land F. Sachal	7/23/2020 9:000		
Signature / Name	Date	Signature / Name	Date
nfirm the information as recorded	is true, accurate and comple	ete.	

"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: byliam Red DESH-UIS Group leady (active)	
Signature: Allians & Deed Date: 7/23/2020  Ac Netals is awaying 2 to 3 deliveries of metal for recipie bins offsit	L
Ace Metals is awaying 2 to 3 deliveries of metal for veryce bins offsit a day. During this intersection there was any are metal for verycle bin a day. During this intersection there was any are metal for verycle bin with metal) that is capital at the end of the day. The cardboard bin with metal) that is capital at the end of the day. The cardboard bin and two of the wood any bins were scheduled to be delivered to the land to be delivered to the	1 55
and two of the wood only bins were scheduled to de Marcon to day.	

### Work Order MSGP-RI-64577

MSGP Routine Inspection Printed 8/5/2020 - 2:51 PM

	ested: 8/5/2020 2:44:28 PM Target: 8/31/2020				
		₹F			
_ast P					
Projec	Routine Facility Inspections August 2020 (P-MSGP-RI-5463)  Clear Supply 1 201. Contact: Phone:				
Reaso	n: 2020 August Inspections  Charlest Valla - Less Han 5	mph			
asks					
uono					
#	Description	Meas.	No	N/A	Yes
	ner Information				
20	Describe the weather at time of inspection and document the temperature (F°).			工	_⊏_
Withir	1 the Facility Boundary				
40	Is the facility free of previously unidentified discharges from and/or pollutants that have occurred since the last inspection If "No" describe.		Г	-	-
50	If "No" has a CAR been previously initiated for this new discharge?		Г	F	Γ.
60	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.		F	T	F
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.		Г	Г	
90 100	Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If		F		<u></u>
110	"No", describe.				
120	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No" describe.		匚	工	_F/
Contro	ol Measures (identify needed maintenance and repairs, failed control measures that need replace ctive actions in relevant task comments).  Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	nent, or a	descri	ption o	of
150	Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				<u>_v</u> _
160	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			<u> </u>	_ <u> _</u>
170	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				F/
180	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				
190	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		匚		_F/
200	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		ட		_F_
210	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		工		_厅_
220	Trench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Retention Pond [6000211010009] Control Measure is operating effectively? If "No" describe				
230	condition & need for Maintenance, Repair, or Replacement.				_⊏_
240	Drop Inlet with Floc logs [6000209030029] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  EnviroSoxx w/ MetalLoxx [6000203200027] Control Measure is operating effectively? If "No"				
250	describe condition & need for Maintenance, Repair, or Replacement.  EnviroSoxx w/ MetalLoxx [6000203200028] Control Measure is operating effectively? If "No"				F
60	describe condition & need for Maintenance, Repair, or Replacement.		Г	г	<b>E</b> /

270	EnviroSoxx w/ MetalLoxx [6000203200030] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	F
<b>Area</b> /A	Activity exposed to stormwater (identify needed mainteance or a description of corrective actions i Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	n relevant tas	k comm	ent).
300	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.		0	<b>'</b> -
310	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.	Б	0	
320	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.	F	0	-
330	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe	Г	0	-
340	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	Г	0	1
350	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	F	E/	Г
360	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		<b>D</b>	
370	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	Г	Г	E/
380	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			
390	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.			<u></u>
100	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		<b>-</b>	
110	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.		<b>E</b> /	
120	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.		<b>F</b> /	Г
130	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	-
440	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	Г	F	P
160	Free of incidents of observed non-compliance not already identified above? If "No" describe.  Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.			F/
abor abor eonar	Assigned Work Date Root 8/5/2020 / 1	eg Hrs OT Hı	rs Othe	er Hrs
Comple Report		except d	for a	~_
Confirm	Signature / Name  Signature / Name  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: DAVID 6. Tev	1140 SUP-3
Signature: De C. Tillo	Date: 8-31-2020
Ph.II.p Ul.boori	UI-OPS-Mgr
Till 1/15	12021

**Maintenance Details** 

### Work Order MSGP-RI-64656

MSGP Routine Inspection Printed 9/8/2020 - 2:55 PM

	dure: MSGP Routine Facility Inspection (EPC-CP-QP- Priority/Type: Normal / Inspection				
Last D	2108 R0 Form 1) M: 8/14/2020 9/23/2020 / SUDE 111:1 4 770F				
Last P	Emo 14 F L/High of 1				
Projec	t: Routine Facility Inspections September 2020 (P-MSGP- RI-5472)  Contact: Phone:				
Reaso	n: 2020 September Inspections    Sind-Calm   Sind-Calm				
asks					
#	Description	Meas.	No	N/A	Yes
	·	meas.	140	IVA	163
	ner Information				
20	Describe the weather at time of inspection and document the temperature (F°).				
Withir	n the Facility Boundary				
	Is the facility free of previously unidentified discharges from and/or pollutants that have				
40	occurred since the last inspection If "No" describe.				F
50	If "No" has a CAR been previously initiated for this new discharge?			F	
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.				_F_
gescri 90	iption of corrective actions in relevant task comment)  Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No",				<u> </u>
100	describe.				
110	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.				F/
120	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No" describe.		Г		F/
	ol Measures (identify needed maintenance and repairs, failed control measures that ne	ed replac	ment, c	or a	
uescri	ption of corrective actions in relevant task comments).  Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No"				
140	describe condition & need for Maintenance, Repair, or Replacement.				<b>E</b> /
	Gravel Bags [6000203100008] Control Measure is operating effectively? If "No"				
150	describe condition & need for Maintenance, Repair, or Replacement.		Г		
	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe				
160	condition & need for Maintenance, Repair, or Replacement.		工		_F_
170	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			Б	F
180	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		П	П	 
190	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		П	Б	
200	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г		
	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No"				
210	describe condition & need for Maintenance, Repair, or Replacement.				_F/
	Trench Drain [6000209040001] Control Measure is operating effectively? If "No"				
220	describe condition & need for Maintenance, Repair, or Replacement.				<u>_F</u> _
230	Retention Pond [6000211010009] Control Measure is operating effectively? If "No"		Γ	Г	

240	Drop Inlet with Floc logs [6000209030029] Control Measure is operating effectively? If	
-40	"No" describe condition & need for Maintenance, Repair, or Replacement.  EnviroSoxx w/ MetalLoxx [6000203200027] Control Measure is operating effectively? If	P
250	"No" describe condition & need for Maintenance, Repair, or Replacement.	ГГЕ
260	EnviroSoxx w/ MetalLoxx [6000203200028] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	<u> </u>
270	EnviroSoxx w/ MetalLoxx [6000203200030] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	ГГБ
Area/A	activity exposed to stormwater (identify needed mainteance or a description of corrective a ent).	ctions in relevant task
290	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
300	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.	
310	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.	
320	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.	
330	Industrial processing and finished product storage areas: controls adequate (appropriate effective, and operating)? If "No" describe.	
340	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
350	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
360	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
370	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	ГГБ
380	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
390	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	
400	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	_ r _ r / r
110	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	
120	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	
130	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	F
140	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	
Non-Co	ompliance	
160	Free of incidents of observed non-compliance not already identified above? If "No" describe.	F
Additio	onal Control Measures	
180	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.	гль
abor		
_abor	Assigned Work Date Reg	Hrs OT Hrs Other H
conor	d Sandoval 9/8/2020 / 1	

Report: Ace Motals is avaraging the oil	two of 4 thirty yard moter of	evect bing
8 thirty yard metal for each	as the large scheduled to pi	chap of Liver
7.7.		
Signature / Name   Date		Date
I confirm the information as recorded is true, accura	ite and complete.	24.0

"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: DAVID E. TRUILLO WORKER, S.P.

Signature: S. T. U. Date: 10-1-2020

Ph. 11: p. Ul. Sarri: U.F.-O.P.S.-Mgr.

AUC 1/15/2021

### Work Order MSGP-RI-64701

MSGP Routine Inspection Printed 10/5/2020 - 2:23 PM

Maintena	ance Details				
Procedur Last PM: Project:	Target: 10/31/2020  WSGP Routine Facility Inspection (EPC-CP-QP-2108 R0 Form 1) 9/23/2020 Routine Facility Inspections October 2020 (P-MSGP-RI-5477)  Target: 10/31/2020 Priority/Type: Normal / Inspection Department: Utilities and Infrastructure TA-60 Contact: Phone:  8:12 a.m.				
Tasks	0.12000				
#	Description	Meas.	No	N/A	Yes
Weather	Information				,
20	Describe the weather at time of inspection and document the temperature (F°).				F
-	e Facility Boundary				
	is the facility free of previously unidentified discharges from and/or pollutants that have				-
	occurred since the last inspection If "No" describe.				. 5
50	If "No" has a CAR been previously initiated for this new discharge?			-	-
60	s the facility free of discharge of pollutants at the time of inspection? If "No" describe.				
ī	s the facility free of evidence of, or the potential for, pollutants entering the drainage				
70 5	system. If "No" describe.				
100	Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.  Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.	=	<u> </u>	<u>+</u>	1
	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No"				
120	describe.				
140 c	Measures (identify needed maintenance and repairs, failed control measures that need tive actions in relevant task comments).  Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.  Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe	replacme	nt, or a	descr	ption
150 c	condition & need for Maintenance, Repair, or Replacement.  Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe		工	工	_⊏_
	condition & need for Maintenance, Repair, or Replacement.				<b>F</b> /
	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" lescribe condition & need for Maintenance, Repair, or Replacement.				P/
180 g	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		. Fr		
	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.				<u>-</u>
	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" lescribe condition & need for Maintenance, Repair, or Replacement.				
210 d	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" lescribe condition & need for Maintenance, Repair, or Replacement.		匚		<b>P</b>
220 c	rench Drain [6000209040001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г		<b>P</b>
	Retention Pond [6000211010009] Control Measure is operating effectively? If "No"				
	lescribe condition & need for Maintenance, Repair, or Replacement.		ᅟᅳ	工	
240 <b>C</b>	Prop Inlet with Floc logs [6000209030029] Control Measure is operating effectively? If		Г	_	

	EnviroSoxx w/ MetalLoxx [6000203200031] Control Measure is operating effectively? If			
250	"No" describe condition & need for Maintenance, Repair, or Replacement.			_P
260	EnviroSoxx w/ MetalLoxx [6000203200032] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			_⊏
270	EnviroSoxx w/ MetalLoxx [6000203200033] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	_	_	
\rea/Ad comme	ctivity exposed to stormwater (identify needed mainteance or a description of corrective actions	in relev	ant tas	k
Omme	•			
90	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			
300	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.			<u></u>
310	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.	Г	[ <del>-</del>	<b>-</b>
320	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.		-/	
	Industrial processing and finished product storage areas: controls adequate (appropriate,			` ·
330	effective, and operating)? If "No" describe.			
340	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			ĹΠ
350	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		_5/	
60	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	_	<b>-</b> /	
70	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.			
80	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			_ <u>~</u> _
90	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.		_~_	
00	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.			
10	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u> </u>	
20	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.			
30	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	10	/_	
40	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	_		
	mpliance			
	Free of incidents of observed non-compliance not already identified above? If "No"			
60	describe.			_=
dditio	nal Control Measures			
	Are permit requirements satisfied with existing control measure(s)? If "No" describe			
80	additional control measures needed.			P
рог				
abor.	Assigned Work Date Reg Hrs	OT H	s Oth	er H
eonard	Sandoval 10/5/2020 / 1			
bor R	eport			
omple	ted:			
, Jinpie				
eport:	T. (a) (20 ) 11 ( ) 11	1 1		

~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	10/212 0.1		
Leaned F. Suchal	10/1/2020 8:45 a.m.		
Signature / Name	ed is true, accurate and comple	Signature / Name	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".

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

Print name and title:_	DAVI	DE TRUJ	ILLO	WORK	EXSUF	
Signature:	J€.	Villa			9-202	0
During the	e inspec	tion all of H	he 30	yad met	al tarvec	ick bins
7	MILP	Ulibarr	(	UI-07	PS-Mg	, C ,
~			1/1	5/20	21	

## Work Order MSGP-RI-64832

MSGP Routine Inspection Printed 11/4/2020 - 12:00 PM

<b>V</b> lainte	enance Details			
Proced Last P Projec	Contact:			
asks				
#	Description Meas.	No	N/A	Yes
Weath	er Information			,
20	Describe the weather at time of inspection and document the temperature (F°).			P
Within	the Facility Boundary			
WAICHILL	Is the facility free of previously unidentified discharges from and/or pollutants that have			,
40	occurred since the last inspection If "No" describe.		_ [	-
50	If "No" has a CAR been previously initiated for this new discharge?	Г	1/	Γ.
30	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.	Г	Г	F/
	Is the facility free of evidence of, or the potential for, pollutants entering the drainage			
70	system. If "No" describe.			
90 100	Monitored Outfall [029] Free of Evidence of Erosion? If "No", describe.  Monitored Outfall [029] Flow Dissipation Devices Operating Effectively? If "No", describe.			<u> </u>
110	Monitored Outfall [029] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.	ь Г	Г	F/
120	Monitored Outfall [029] Free of any unauthorized non-stormwater discharges? If "No" describe.			F/
	ol Measures (identify needed maintenance and repairs, failed control measures that need replacr rective actions in relevant task comments).	nent, oı	a desc	ription
140	Asphalt Berm [6000203040011] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	П		_⊏_
150	Gravel Bags [6000203100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		.Д.	F
160	Eco-Block [6000203110003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			F
170	Rock Channel/Swale [6000204030004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		Г	
180	Rip Rap [6000204060006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		厂	
90	Rip Rap [6000204060007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		П	
200	Base Course Swale [6000204100002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		П	
210	Rock Check Dam [6000206010005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			
220	<b>Trench Drain [6000209040001]</b> Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.			-
230	Retention Pond [6000211010009] Control Measure is operating effectively? If "No"			-

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80	additional control measures needed.	
	nal Control Measures  Are permit requirements satisfied with existing control measure(s)? If "No" describe	
60	describe.	
lon-Co	empliance Free of incidents of observed non-compliance not already identified above? If "No"	
40	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	ГГР
30	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	Г Г Г
20	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	F F/F
10	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	F F/ F
00	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	
90	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	F F/F
80	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	F F/F
70	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	
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40 50	and operating)? If "No" describe.  Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	
30	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,	
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10	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.  Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and	<u> </u>
00	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.	
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	ctivity exposed to stormwater (identify needed mainteance or a description of correctiv	e actions in relevant task
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60	EnviroSoxx w/ MetalLoxx [6000203200032] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	ГГБ
50	EnviroSoxx w/ MetalLoxx [6000203200031] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	
40	<b>Drop Inlet with Floc logs [6000209030029]</b> Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	
	describe condition & need for Maintenance, Repair, or Replacement.	

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"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering 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: Dana Parrett WEM covering for David Trugillo
Signature: 11/9/20
Signature:
Philip Ulibarr, UF-OPS-Mgr,
Fuc 1/15/2021

**Maintenance Details** 

## Work Order MSGP-RI-64923

MSGP Routine Inspection Printed 12/1/2020 - 11:11 AM

	## Arget: 12/1/2020 11:04:00 AM Target: 12/31/2020 ☐ MSGP  ## MSGP Routine Facility Priority/Type: Normal / Inspection ☐ RG121  ## TA-60	1.9			
4 D	R0 Form 1) 12/11/12/20 T 1/07 11 1 3 1 19 5	MKF			
.ast P Projec	Contact	ph			
Reaso	n: 2020 December Inspections 10:00 a.m.	1			
asks					
#	Description	Meas.	No	N/A	Yes
Neath	ner Information				
20	Describe the weather at time of inspection and document the temperature (F°).				_F_
<b>/</b> Vithir	the Facility Boundary				
	Is the facility free of previously unidentified discharges from and/or pollutants that have				
40	occurred since the last inspection If "No" describe.				F
50	If "No" has a CAR been previously initiated for this new discharge?				<u> </u>
60	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.				
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.				<b>~</b>
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"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering 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)

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## ATTACHMENT 8: QUARTERLY VISUAL ASSESSMENTS



To: Leonard Sandoval, DESH-UIS, K760 Thru: Terrill Lemke, EPC-CP, K490 W

From: Holly Wheeler, EPC-CP, K490

Phone: 505-667-1312 Symbol: EPC-DO: 20-207

Date: SEP 2 9 2020

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 2020 for the TA-60 Material Recycling Facility

Please find attached the completed MSGP QVA form documenting a visual assessment performed during the first quarter of monitoring at the TA-60 Material Recycling Facility. 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: 20-207 Mr. Leonard Sandoval

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-60 MRF	MSGP02901	MSGP-64365	

TWL/HLW:jdm

Attachment(s): Attachment 1 Quarterly Visual Assessment Form, First Quarter, 2020 Monitoring Year

Copy: Michael Hazen, ALDESHQSS, mhazen@lanl.gov
Terrill Lemke, EPC-CP, tlemke@lanl.gov
William Mairson, ALDESHQSS, whreed@lanl.gov
Enrique Torres, EWP, etorres@lanl.gov
Jennifer Payne, EPC-DO, jpayne@lanl.gov
William Reed, DESH-UIS, rdstone@lanl.gov
Taunia Van Valkenburg, EPC-CP, tauniav@lanl.gov
adesh-records@lanl.gov
epccorresondence@lanl.gov



# **ATTACHMENT 1**

Quarterly Visual Assessment Form, First Quarter, 2020 Monitoring Year

EPC-DO: 20-207

Date:	SEF	2	9	2020	

## Work Order MSGP-64365

MSGP Monitoring Stations Printed 6/11/2020 - 2:27 PM

ance Details						
ed By: Banar, Alethea on 6/3/2020 3:09:00 PM	Target: 5/31/2020 Priority/Type: / Inspection	☑ MSG 品 RG1	SP Program			
: Banar, Alethea	Department: Utilities and Infrastructure	TA-6				
Assessment (EPC-CP-QP-2105 R0 Form 1)		Moni	tored Outfall	(029)		
		Contact	· Ranar Alati	haa		
4/1/20 (P-MSGP-5433)				lea		
MSGP Quarterly Visual Assessn	ent					
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information						
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If "Failed", provide description (e.g. musty, sewage, sulfur, solvent, petroleum/gas)	Assessment (EPC-CP-QP-2105 R0 Form 1) 6/2/2020 Visual Assessments 4/1/20 (P-MSGP-5433)  MSGP Quarterly Visual Assessments 4/1/20 (P-MSGP-5433)  MSGP Quarterly Visual Assessment  Description  If of this VA applies to associated SIOs as defined in the SWPPP, where applicable.  Information  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 reason.  ers  Is sample colorless? If "Failed", describe.  Is sample oderless? If "Failed", provide description (e.g., musty, sewage, sulfur, sour.	me: MSGP Quarterly Visual Assessment (EPC-CP-QP-2105 R0 Form 1) 6/2/2020 Visual Assessments 4/1/20 (P-MSGP-5433)  MSGP Quarterly Visual Assessment  Description  Meas.  It of this VA applies to associated SIOs as defined in the SWPPP, where applicable.  Information  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 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 reason.  ars  Is sample colorless? If "Failed", describe.  Is sample oderless? If "Failed", provide description (e.g., musty, sewage, sulfur, sour. solvent, petroleum/gas)  musty	Monitored Outfall (029) Assessment (EPC-CP- QP-2105 R0 Form 1) 6/2/2020 Visual Assessments 4/1/20 (P-MSGP-5433)  MSGP Quarterly Visual Assessment  Description  Meas.  No att of this VA applies to associated SIOs as defined in the SWPPP, where applicable.  Information  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 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 reason.  ers  Is sample colorless? If "Failed", describe.  Is sample oderless? If "Failed", provide description (e.g., musty, sewage, sulfur, sour.  solvent, petroleum/gas)  musty	MSGP Quarterly Visual Assessment (EPC-CP-QP-2105 R0 Form 1) 6/2/2020 Visual Assessments 4/1/20 (P-MSGP-5433)  MSGP Quarterly Visual Assessment  Meas. No N/A  If of this VA applies to associated SIOs as defined in the SWPPP, where applicable.  Information  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 reason.  Is sample colorless? If "Failed", provide description (e.g. musty, sewage, sulfur, sour, solvent, petroleum/gas)  Meas. No N/A  No N/A  Meas. No N/A  No N/A  In Contact: Banar, Alethea  Contact: Banar, Alethea  Meas. No N/A  No N/A  In Contact: Banar, Alethea  Phone: 699-5836  No N/A  In C

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 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: Taunia Van Valkenburg, EPC-	CP Group Leader	-
Signature:	(See signature on file)	_Date:	



To: Leonard Sandoval, EPC-CP, K760

Thru: Terrill Lemke, EPC-CP, K490

From: Holly Wheeler, EPC-CP, K490

Phone: 505-667-1312 Symbol: EPC-DO: 20-298 Date: OCT 0 2 2020

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 2020 for the TA-60 Material Recycling Facility

Please find the completed MSGP QVA form attached documenting a visual assessment performed during the second quarter of monitoring at the TA-60 Material Recycling Facility. 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: 20-298 Leonard Sandoval

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

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-60 MRF	MSGP02901	MSGP-64385

TWL/HLW:jdm

Attachment(s): Attachment 1 Quarterly Visual Assessment Form, Second Quarter, 2020 Monitoring Year

Copy: Michael Hazen, Triad, ALDESHQSS, mhazen@lanl.gov
William Mairson, Triad, ALDESHQSS, whreed@lanl.gov
Enrique Torres, Triad, EWP, etorres@lanl.gov
Jennifer Payne, Triad, EPC-DO, jpayne@lanl.gov
Taunia Van Valkenburg, Triad, EPC-CP, tauniav@lanl.gov
Jack Caldwell, Triad, LOG-SUP, jackc@lanl.gov
Danny Esquibel, Triad, LOG-HERG, esquibel\_danny@lanl.gov
Phillip Ulibarri, Triad, UI-OPS, phillip@lanl.gov
adesh-records@lanl.gov
epccorrespondence@lanl.gov



# **ATTACHMENT 1**

Quarterly Visual Assessment Form, Second Quarter, 2020 Monitoring Year

EPC-DO: 20-298

Date: \_\_\_\_\_ 0CT 0 2 2020

**Maintenance Details** 

EPC-DO: 20-298

## Work Order MSGP-64385

MSGP Monitoring Stations Printed 8/13/2020 - 2:25 PM

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ocedure:	: 6/8/2020 5:55:00 PM : MSGP Quarterly Visual Assessment (EPC-CP-QP- 2105 R0 Form 1) 6/8/2020	Target: Priority/Type: Department:	7/31/2020 Normal / Inspection Utilities and Infrastructure	MSGP Program RG121.9 TA-60 MRF Monitored Outfall MSGP02901	(029)		
ast PM: roject:	Visual Assessments 6/1/20 (P-MSGP-5449)			Contact:			
eason: N	MSGP Quarterly Visual Assess	ment		Phone:			
sks							
JNO				Meas.	No	N/A	Yes
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[	Document the Date/time sample (using mm/dd/yy hh:mm format	e visually assesse	ed in the "Reading" field of th	is line 6/8/2020 @ 13:57	Г		TV.
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80 1	reason.						
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120	solvent, petroleum/gas)			musty	13%	F	- <u>-</u> -
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170	Is sample foamless after gentle	sample').				Г	
	Is sample devoid of an oil she	en? If "Failed", de	scribe color and thickness (e	e.g. flecks,	Г	F	TV
180	globs). Is sample free of other obviou	s indicators of po	llution? If "Failed", describe.				IV
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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 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 mu	st meet definition in Section B.11.A, e	g. FOD, Ops Mgr, DESH Group Leader, EPC Group Leader)	
Print name and	title: <u>Taunia Van Valkenburg, EPC</u>	-CP Group Leader	
Signature:	(See signature on file)	Date:	



To: Leonard Sandoval, EPC-CP, K760

Thru: Terrill Lemke, EPC-CP, K490 Tul

From: Holly Wheeler, EPC-CP, K490

Phone: 505-667-1312 Symbol: EPC-DO: 20-403

Date: JAN 1 3 2021

## memorandum

Environmental Protection & Compliance Division

Compliance Programs Group

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 2020 for the TA-60 Material Recycling Facility

Please find attached the completed MSGP QVA form documenting a visual assessment performed during the third quarter of monitoring at the TA-60 Material Recycling Facility. 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

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 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 Storm Water Permitting/Compliance Team 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.

Terrill W. Lemke, EPC-CP Storm Water Permitting/Compliance Team Leader Los Alamos National Laboratory

ne Duffee

1/13/2021

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-60 MRF	MSGP02901	MSGP-64585

TWL/HLW:jdm

Attachment(s): Attachment 1 Quarterly Visual Assessment Form, Third Quarter, 2020 Monitoring Year

Copy: Taunia Van Valkenburg, Triad, EPC-CP, tauniav@lanl.gov Jack Caldwell, LOG-SUP, jackc@lanl.gov Danny Esquibel, LOG-HERG, esquibel danny@lanl.gov Phillip Ulibarri, Triad, UI-OPS-OM, phillip@lanl.gov adesh-records@lanl.gov epccorrespondence@lanl.gov



# **ATTACHMENT 1**

# Quarterly Visual Assessment Form, Third Quarter, 2020 Monitoring Year

EPC-DO: 20-403

## Work Order MSGP-64585

MSGP Monitoring Stations Printed 10/6/2020 - 2:25 PM

	e: MSGP Quarterly Visual Assessment (EPC-CP-QP- 2105 R0 Form 1)	Target: Priority/Type: Department:	9/30/2020 / Inspection Utilities and Infrastructure	MSGP  RG12  TA-60  Monito	1.9	(029)		
ast PM: roject:	8/12/2020 Visual Assessments 8/1/20 (P-MSGP-5464)			MSGP	02901			
teason:	MSGP Quarterly Visual Assessn	nent		Contact: Phone:				
ısks								
# 1	Description				Meas.	No	N/A	Yes
	ilt of this VA applies to associa	ed SIOs as defi	ned in the SWPPP, where a	applicable.				
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	Is sample clear? If "Failed", provi	de description (e.	.g., slightly cloudy, cloudy, o	paque).	Opaque	134	Г	
	Is sample free of floating solids? comments of this line.					П		
	Is sample free of settled solids? I	f "Failed", provide	e description (e.g., fine, cour	se).	fine	1X		
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170	Is sample foamless after gently s (e.g., 'on the surface' or 'in the sa	haking? If "Failed nple').	l" describe foam color and lo	ocation				ď
180	Is sample devoid of an oil sheen globs).			g. flecks,				<u>v</u>
190	Is sample free of other obvious in	dicators of pollut	ion? If "Failed", describe.		-			
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	MSK.	9/8/2020					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".

(Signatory must meet definition in Section B.11.A, eg. FOD, Ops I	Mgr, DESH Group Leader, EPC Group or Team Leader)
Print name and title: Terrill W. Lemke, EPC-CP Storm Water Perm	itting/Compliance Team Leader
Signature: (See signature on file)	Date:



To: Leonard Sandoval, EPC-CP, K760 Thru: Terrill Lemke, EPC-CP, K490

From: Holly Wheeler, EPC-CP, K490

Phone: 505-667-1312

Symbol: EPC-DO: 21-011

Date: JAN 1 4 2021

Environmental Protection & Compliance Division

Compliance Programs Group

Subject: National Pollutant Discharge Elimination System (NPDES) Permit Tracking No. NMR050013, Multi-Sector General Permit (MSGP) Quarterly Visual Assessment (QVA) Form for October and November of 2020 for the TA-60 Material **Recycling Facility** 

Please find attached the completed MSGP QVA form documenting a visual assessment performed during the fourth quarter of monitoring at the TA-60 Material Recycling Facility. 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.

June – July Quarter 2: Ouarter 1: April – May

Ouarter 4: October - November August – September Ouarter 3:

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 Storm Water Permitting/Compliance Team 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.

<u>Terrill W. Lemke, EPC-CP Storm Water Permitting/Compliance Team Leader</u> Los Alamos National Laboratory

Manager Signature

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-60 MRF	MSGP02901	MSGP-64808

TWL/HLW:jdm

Attachment(s): Attachment 1 Quarterly Visual Assessment Form, Fourth Quarter, 2020 Monitoring Year

Copy: Taunia Van Valkenburg, EPC-CP, tauniav@lanl.gov
Jack Caldwell, LOG-SUP, jackc@lanl.gov
Danny Esquibel, LOG-HERG, esquibel\_danny@lanl.gov
Phillip Ulibarri, UI-OPS, phillip@lanl.gov
adesh-records@lanl.gov

epccorrespondence@lanl.gov



# **ATTACHMENT 1**

Quarterly Visual Assessment Form, Fourth Quarter, 2020 Monitoring Year

EPC-DO: 21-011

Date:	JAN 1 4 2021

## Work Order MSGP-64808

MSGP Monitoring Stations Printed 12/10/2020 - 11:58 AM

	MSGP Quarterly Visual Priority/Type: / Inspection  Assessment (EPC-CP-QP- Department: Utilities and Infrastructure → To	SGP Program G121.9 A-60 MRF onitored Outfall	(029)		
ast PM:		SGP02901			
roject:	Visual Assessments 10/1/20 (P-MSGP-5485) Cont	act:			
eason: N	ASGP Quarterly Visual Assessment Phor	ie:			
sks					
# De	escription	Meas.	No	N/A	Yes
The result	of this VA applies to associated SIOs as defined in the SWPPP, where applica	ble.			
-	formation	oct-nov		-	TV.
	ocument the monitoring Period (e.g., Apr-May) ocument the Date/Time Discharge began in the "Reading" field of this line (using	10/27/20 @			
	ocument the Date/Time Discharge began in the "Reading" field of this line (using m/dd/yy hh:mm format).	13:31		Г	1
	ocument the Date/time sample collected in the "Reading" field of this line (using	10/27/20 @			
0 m	m/dd/yy hh:mm format).	13:31			TV.
	ocument the Date/time sample visually assessed in the "Reading" field of this line	10/29/20 @	-	_	77.0
	sing mm/dd/yy hh:mm format).	11:04			
De Or	ocument the nature of discharge (e.g., rain, snowmelt). Document the TOTAL mount (in) in the "Reading" field of this line	snowmelt	Г	Г	TV.
	ample collected in first 30 minutes of discharge? If "Failed" or unknown, provide a	22.11./1911	-	-	
	eason.				V
Parameter	rs				
440 - 1-	sample colorless? If "Failed", describe.	brown	IX.		
110 ls					
ls	sample oderless? If "Failed", provide description (e.g. musty, sewage, sulfur, sour,	Slightly			_
ls	sample oderless? If "Failed", provide description (e.g. musty, sewage, sulfur, sour, plyent, petroleum/gas)	musty	r <b>x</b>		U
ls 120 sc	olvent, petroleum/gas)	musty slightly	rat		 
120 so	olvent, petroleum/gas) sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque).	musty slightly cloudy	IX.		
Is   120   sc   130   Is   Is	olvent, petroleum/gas) sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque). sample free of floating solids? If "Failed", describe if raw or waste material(s) in the	musty slightly cloudy	IX		
Is   120   Sc   130   Is   Is   140   CC	olvent, petroleum/gas)  sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque). sample free of floating solids? If "Failed", describe if raw or waste material(s) in the omments of this line.	musty slightly cloudy	IX		
Is   120   Is   130   Is   140   CC   150   Is	olvent, petroleum/gas)  sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque). sample free of floating solids? If "Failed", describe if raw or waste material(s) in the omments of this line. sample free of settled solids? If "Failed", provide description (e.g., fine, course).	musty slightly cloudy	iX		
Is	olvent, petroleum/gas)  sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque). sample free of floating solids? If "Failed", describe if raw or waste material(s) in the omments of this line. sample free of settled solids? If "Failed", provide description (e.g., fine, course). sample free of suspended solids? If "Failed", provide description (e.g., fine, ourse).	musty slightly cloudy	<b>X</b>		
Is   Is   Is   Is   Is   Is   Is   Is	sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque). sample free of floating solids? If "Failed", describe if raw or waste material(s) in the omments of this line.  sample free of settled solids? If "Failed", provide description (e.g., fine, course). sample free of suspended solids? If "Failed", provide description (e.g., fine, ourse). sample foamless after gently shaking? If "Failed" describe foam color and location	musty slightly cloudy	X		<u>r</u>
Is   Is   Is   Is   Is   Is   Is   Is	sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque). sample free of floating solids? If "Failed", describe if raw or waste material(s) in the omments of this line. sample free of settled solids? If "Failed", provide description (e.g., fine, course). sample free of suspended solids? If "Failed", provide description (e.g., fine, ourse). sample foamless after gently shaking? If "Failed" describe foam color and location e.g., 'on the surface' or 'in the sample').	musty slightly cloudy	1 <b>X</b>		<u>r</u>
Is   Is   Is   Is   Is   Is   Is   Is	sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque). sample free of floating solids? If "Failed", describe if raw or waste material(s) in the omments of this line.  sample free of settled solids? If "Failed", provide description (e.g., fine, course). sample free of suspended solids? If "Failed", provide description (e.g., fine, ourse). sample foamless after gently shaking? If "Failed" describe foam color and location	musty slightly cloudy			

"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 or Team Leader)					
Print name and title	e:Terrill W. Lemke, EPC-CP Storm Water Perm	iting/Compliance Team Leader			
Signature:(	See signature on file)	Date:			



Environmental Protection & **Compliance Division** 

Compliance Programs Group

To: Leonard Sandoval, DESH-UIS, K760

Thru: Terrill Lemke, EPC-CP, K490

From: Holly Wheeler, EPC-CP, K490  $\vee$  \(\lambda\)

Phone: 505-667-1312 Symbol: EPC-DO: 19-202

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-60 Material Recycling **Facility** 

Please find attached the completed MSGP QVA form documenting a visual assessment performed during the first quarter of monitoring at the TA-60 Material Recycling Facility. 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 Ouarter 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: 19-202 Leonard Sandoval

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

2 Dw flo fation 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-60 MRF	MSGP02901	MSGP-63609

TWL/HLW:jdm

Attachment(s): Attachment 1 Quarterly Visual Assessment Form, First Quarter, 2019 Monitoring Year



Page 3

EPC-DO: 19-202 Leonard Sandoval

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, 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: 19-202

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

**Maintenance Details** 

## Work Order MSGP-63609

MSGP Monitoring Stations Printed 5/21/2019 - 4:22 PM

eason:	Assessment (EPC-CP-Form- Department: Utilities and Infrastructure 1021.2)  ast PM: 4/23/2019  visual Assessments 4/1/2019 (P-MSGP-5366)  Contact:				
	MSGP Quarterly Visual Assessment Phone	<del>)</del> :			
asks					
# [	Description	Meas.	No	N/A	Yes
The resul	It of this VA applies to associated SIOs as defined in the SWPPP, where applicab	le.			
Sample in	nformation				
	Document the monitoring Period (e.g., Apr-May)	Apr-May			
	Document the Date/Time Discharge began in the "Reading" field of this line (using nm/dd/yy hh:mm format).	4/22/19 @ 23:46			1
	Document the Date/time sample collected in the "Reading" field of this line (using nm/dd/yy hh:mm format).	4/22/19 @ 23:46			10
	Document the Date/time sample visually assessed in the "Reading" field of this line using mm/dd/yy hh:mm format).	4/23/19 @ 10:48			
	Document the nature of discharge (e.g., rain, snowmelt). Document the TOTAL amoun in) in the "Reading" field of this line.	t rain 0.74			10
	Sample collected in first 30 minutes of discharge? If "Failed" or unknown, provide a eason.				<b>13/</b>
Paramete	ers				
110 Is	s sample colorless? If "Failed", describe.	brown	130		
Is	s sample colorless? If "Failed", describe. s sample oderless? If "Failed", provide description (e.g. musty, sewage, sulfur, sour, olvent, petroleum/gas)	brown	TAX.	Г	TV
120 s	s sample oderless? If "Failed", provide description (e.g. musty, sewage, sulfur, sour, olvent, petroleum/gas)	slightly			TV.
Is  20	s sample oderless? If "Failed", provide description (e.g. musty, sewage, sulfur, sour, olvent, petroleum/gas) s sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque).		ix ix		IV
Is   120   S   130   Is	s sample oderless? If "Failed", provide description (e.g. musty, sewage, sulfur, sour, olvent, petroleum/gas)	slightly	ix		
120 s 130 ls 140 c	s sample oderless? If "Failed", provide description (e.g. musty, sewage, sulfur, sour, solvent, petroleum/gas) s sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque). s sample free of floating solids? If "Failed", describe if raw or waste material(s) in the	slightly			
Is   120	s sample oderless? If "Failed", provide description (e.g. musty, sewage, sulfur, sour, olvent, petroleum/gas) s sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque). s sample free of floating solids? If "Failed", describe if raw or waste material(s) in the comments of this line.	slightly			
Is   120   S   130   Is   140   C   150   Is   160   Is	s sample oderless? If "Failed", provide description (e.g. musty, sewage, sulfur, sour, solvent, petroleum/gas) s sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque). s sample free of floating solids? If "Failed", describe if raw or waste material(s) in the somments of this line. s sample free of settled solids? If "Failed", provide description (e.g., fine, course).	slightly			
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120	s sample oderless? If "Failed", provide description (e.g. musty, sewage, sulfur, sour, solvent, petroleum/gas)  s sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque). s sample free of floating solids? If "Failed", describe if raw or waste material(s) in the somments of this line. s sample free of settled solids? If "Failed", provide description (e.g., fine, course). s sample free of suspended solids? If "Failed", provide description (e.g., fine, course). s sample foamless after gently shaking? If "Failed" describe foam color and location e.g., 'on the surface' or 'in the sample').	slightly cloudy			

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: <u>Taunia Van Valkenburg, EPC-CP C</u>	Group Leader					
Signature: (See signature on file)	Date:					



To: Leonard Sandoval, DESH-UIS, K760
Thru: Terrill Lemke, EPC-CP, K490
From: Holly Wheeler, EPC-CP, K490

Phone: 505-667-1312 Symbol: EPC-DO: 19-314

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-60 Material Recycling Facility

Please find the completed MSGP QVA form attached documenting a visual assessment performed during the second quarter of monitoring at the TA-60 Material Recycling Facility. 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: 19-314 Leonard Sandoval

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

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-60 MRF	MSGP02901	MSGP-63790

TWL/HLW:jdm

Attachment(s): Attachment 1 Quarterly Visual Assessment Form, Second Quarter, 2019
Monitoring Year

Copy: Michael Hazen, ALDESHQSS, <a href="mailto:mhazen@lanl.gov">mhazen@lanl.gov</a>
William Mairson, ALDESHQSS, <a href="mailto:wrmairson@lanl.gov">wrmairson@lanl.gov</a>
Russell Stone, DESH-UIS, <a href="mailto:rdstone@lanl.gov">rdstone@lanl.gov</a>
Enrique Torres, EPC-DO, <a href="mailto:etorres@lanl.gov">etorres@lanl.gov</a>
Jennifer Payne, EPC-DO, <a href="mailto:jpayne@Lanl.gov">jpayne@Lanl.gov</a>

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: 19-314

Date: SEP 0 3 2019

## Los Alamos National Laboratory

Maintenance Details

#### Work Order MSGP-63790

MSGP Monitoring Stations Printed 8/2/2019 - 4:36 PM

		: 7/8/2019 9:24:00 AM : MSGP Quarterly Visual Assessment (EPC-CP-Form- 1021.2)	Target: Priority/Type: Department:	•	品 RG12		I (029)		
Last P	PM:	7/2/2019			MSGI	202901	1 (023)		
Projec	ct:	Visual Assessments 6/1/19 (P-MSGP-5378)							
Reaso	on: N	/ISGP Quarterly Visual Assessm	nent		Contact: Phone:				
asks									
#	D	escription				Meas.	No	N/A	Yes
The re	esult	of this VA applies to associat	ed SIOs as defi	ned in the SWPPP, where a	pplicable.				
Samp	le int	formation							
30		ocument the monitoring Period (				jun-july			V
40		ocument the Date/Time Discharq m/dd/yy hh:mm format).	ge began in the '	'Reading" field of this line (us	sing	7/25/19 12:10			TV.
50	<u>m</u> ı	ocument the Date/time sample o m/dd/yy hh:mm format).				7/25/19 12:10			TV.
60	<u>(u</u> :	ocument the Date/time sample v sing mm/dd/yy hh:mm format).				7/25/19 14:02			TV.
'0	(in	ocument the nature of discharge i) in the "Reading" field of this lir	ie.			rain .83			10
30		ample collected in first 30 minute ason.	es of discharge?	If "Failed" or unknown, provi	de a			П	TV.
Param	neter	S							
110	Is	sample colorless? If "Failed", de	escribe.			brown	136		
20		sample oderless? If "Failed", pro lvent, petroleum/gas)	ovide description	ı (e.g. musty, sewage, sulfur,	sour,				
30	Is	sample clear? If "Failed", provid	e description (e.	g., slightly cloudy, cloudy, op	aque).	cloudy	1X	П	П
40		sample free of floating solids? If mments of this line.	"Failed", descril	pe if raw or waste material(s)	in the				1
50	ls	sample free of settled solids? If	"Failed", provide	description (e.g., fine, cours	se).				1
60	Is	sample free of suspended solids	? If "Failed", pro	ovide description (e.g., fine, o	course).				1
70		sample foamless after gently sh g.,'on the surface' or 'in the sam		" describe foam color and lo	cation				R.
80		sample devoid of an oil sheen? obs).	If "Failed", descr	ibe color and thickness (e.g.	flecks,				Tel .
90	_ls	sample free of other obvious inc	licators of polluti	on? If "Failed", describe.					4
•	leted	ort: 7/25/2019 2:02:00 PM arwin Shendo							
	' \	ignature / Name	7/31/2019 Date	Signatur	e / Name		_	Data	
onfir		ignature / Name e information as recorded is t			e / Name			Date	
		DO: 19-314		Attachment 1				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 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:



memorandum

Environmental Protection & Compliance Division

Compliance Programs Group

To: Leonard Sandoval, DESH-UIS, K760
Thru: Terrill Lemke, EPC-CP, K490

From: Holly Wheeler, EPC-CP, K490

Phone: 505-667-1312 Symbol: EPC-DO: 19-381

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) Form for August and September of 2019 for the TA-60 Material

**Recycling Facility** 

Please find attached the completed MSGP QVA form documenting a visual assessment performed during the third quarter of monitoring at the TA-60 Material Recycling Facility. 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.



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-60 MRF	MSGP02901	MSGP-63890

TWL/HLW:jdm

Attachment(s): Attachment 1 Quarterly Visual Assessment Form, Third Quarter, 2019 Monitoring Year

Copy: Michael Hazen, ALDESHQSS, mhazen@lanl.gov
William Mairson, ALDESHQSS, wrmairson@lanl.gov
Jennifer Payne, EPC-DO, jpayne@lanl.gov
Russell Stone, DESH-UIS, rdstone@lanl.gov
Enrique Torres, EPC-DO, etorres@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: 19-381

Date:	NOV A C 9040
Dail.	NOV 2 6 2019

### Los Alamos National Laboratory

**Maintenance Details** 

#### Work Order MSGP-63890

MSGP Monitoring Stations Printed 8/21/2019 - 9:10 AM

8/8/2019 Visual Assessments 8/1/19 (P-MSGP-5390) SGP Quarterly Visual Assessments 8/1/19	nent		MSGF Contact: Phone:	P02901			
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of this VA applies to				Meas.	No	N/A	Yes
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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, 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:



memorandum

Environmental Protection & Compliance Division

Compliance Programs Group

To: Leonard Sandoval, DESH-UIS, K760

Thru: Terrill Lemke, EPC-DO, K490

From: Holly Wheeler, EPC-CP, K490

Phone: 505-667-1312 Symbol: EPC-DO: 19-458

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) Form for October and November of 2019 for the TA-60 Material Recycling Facility

Please find attached the completed MSGP QVA form documenting a visual assessment performed during the fourth quarter of monitoring at the TA-60 Material Recycling Facility. 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.



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

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-60 MRF	MSGP02901	MSGP-64001

TWL/HLW:jdm

Attachment(s): Attachment 1 Quarterly Visual Assessment Form, Fourth Quarter, 2019

Monitoring Year

Copy: Michael Hazen, ALDESHOSS, mhazen@lanl.gov William Mairson, ALDESHQSS, wrmairson@lanl.gov Enrique Torres, EWP, 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

> epccorresondence@lanl.gov adesh-records@lanl.gov



## **ATTACHMENT 1**

Quarterly Visual Assessment Form, Fourth Quarter, 2019 Monitoring Year

EPC-DO: 19-458

Date: JAN 1 0 2020	
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### **Los Alamos National Laboratory**

**Maintenance Details** 

#### Work Order MSGP-64001

MSGP Monitoring Stations Printed 10/28/2019 - 2:30 PM

Procedu	re: MSGP Quarterly Visual Assessment (EPC-CP-Form- 1021.2)		11/30/2019 Normal / Inspection Utilities and Infrastructure	當 MSGP 品 RG121 ♣ TA-60 ♠ Monito	l.9 MRF red Outfall	(029)		
ast PM: roject:	Visual Assessments 10/1/19			MSGP	02901			
eason:	(P-MSGP-5407)  MSGP Quarterly Visual Assessn	nent		Contact:				
	·							
sks								
#	Description				Meas.	No	N/A	Yes
he resu	ult of this VA applies to associat	ed SIOs as defir	ned in the SWPPP, where a	pplicable.				
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	Document the nature of discharge (in) in the "Reading" field of this lir		melt). Document the TOTAL		rain .49			
	Sample collected in first 30 minute reason.	es of discharge? I	f "Failed" or unknown, provid	de a		П	П	
aramet	ers							
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50	Is sample free of settled solids? If	"Failed", provide	description (e.g., fine, cours	e).				TV.
	Is sample free of suspended solid							W
	Is sample foamless after gently sh (e.g.,'on the surface' or 'in the sam Comments: Slight foam		describe foam color and loc		on the surface	136	П	П
	Is sample devoid of an oil sheen?	If "Failed", descri	be color and thickness (e.g.			Г	П	10
	Is sample free of other obvious inc	licators of pollutio	n? If "Failed", describe.			П	П	V
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eport:	Marwin Shendo							
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"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering 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)

# 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.

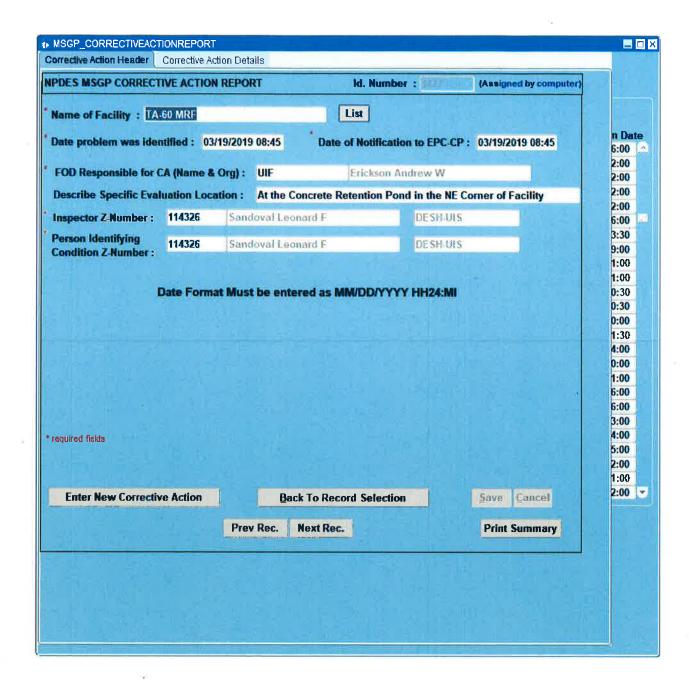
Printed Name: Philip Ulibarr.	Title: _	UI-OPS Mar.	
Signature: Nell de	Date: _	0//15/2021	

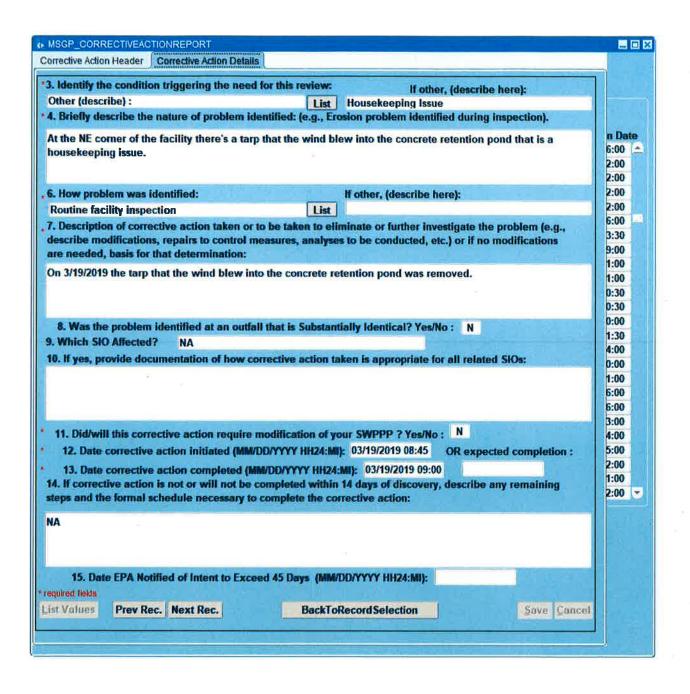
CA	FOD	Msgp Facility	Inspection Date	Specific Location	Inspector Name	Report Status	Finding Description	Finding Other Desc	Problem Description	Inspection Type	Inspection Type Other Description	Corrective Action Description	SWPPP Modification Required?	Corrective Action Initiate Date	Corrective Action Complete Date	Complete Flag	Days Open
1863	3 UI	TA-60 MRF	07-Oct-20	In front of 30 yard metal for recycle bin number 1706.	SANDOVAL LEONARD F	A new corrective action	Other (describe):	Housekeeping Issue	In front of 30 yard metal for recycle bin number 1706 there's metal shavings on asphalt that are a housekeeping issue.	Routine facility inspection		In front of 30 yard metal for recycle bin number 1706 there's metal shavings on asphalt that are a housekeeping issue.	N	07-Oct-20	07-Oct-20	Y	0
1782	? UI	TA-60 MRF	20-May-20	Oil Staining on Soil Just to the South of the Concrete Retention Pond	SANDOVAL LEONARD F	A new corrective action	Unauthorized release or discharge		Just to the south of the concrete retention pond there's an oil stain on soil that needs to be cleaned up.	Routine facility inspection		On 5/20/2020 the oil stain on soil just to the south of the concrete retention pond was cleaned up.	N	20-May-20	20-May-20	Y	0
1781	UI	TA-60 MRF	18-May-20	Outfall 029 at the TA-60 Material Recycling Facility	WHEELER HOLLY L	A new corrective action	Impaired water quality exceedance		Discharge from outfall 029 at TA-60 MRF exceeded the New Mexico water quality standard for dissolved Copper. The concentration of dissolved Copper discharged during the storm event on 04/13/2020 was 32.3 ug/L and the water quality standard is 7.0 ug/L.	Impaired waters monitoring		On 5/20/2020 a through walkdown of the staging area for the metal for recycle bins at the Material Recyling Facility was performed and several pieces of electrical wiring with copper were found throughout the yard and are believed to be the source of the copper exceedance. A push magnet or wheels was also run throughout the yard to pickup any smaller pieces of metal and will be repeated weekly. At the end of each working day the metal for recycle bins are also covered to help water from coming in contact with any metal.		19-May-20	20-May-20	Y	2
1746	S UI	TA-60 MRF	17-Apr-20	Lower east yard at the TA-60 Material Recycling Facility	WHEELER HOLLY L	A new corrective action	Control measures inadequate to meet non-numeric effluent limitations		At the TA-60 Material Recycling Facility, there were several 30 CY roll-off bins that contained metal for recycle that were not covered.		Observed while in the area.	On 4/20/2020 the 30 CY roll-off bins that contain metal for recycle, were covered.	N	17-Apr-20	20-Apr-20	Y	3

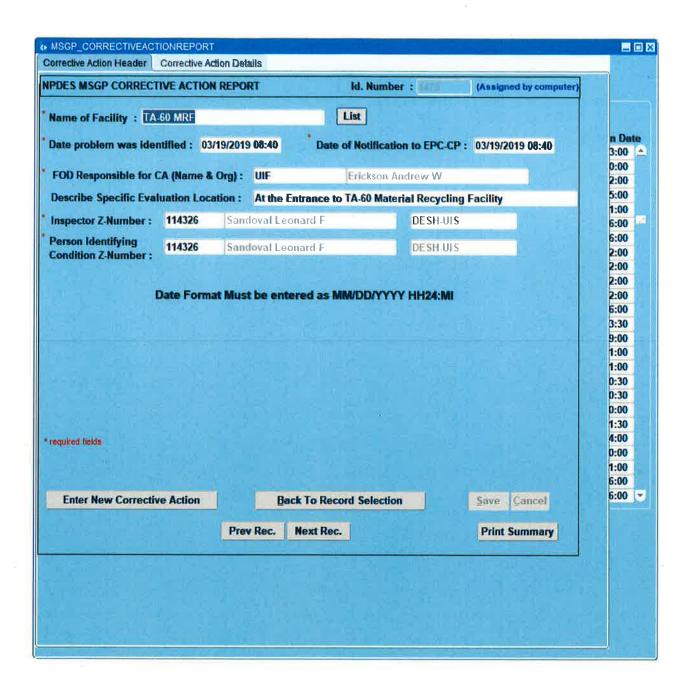
#### **CERTIFICATION FOR CORRECTIVE ACTIONS**

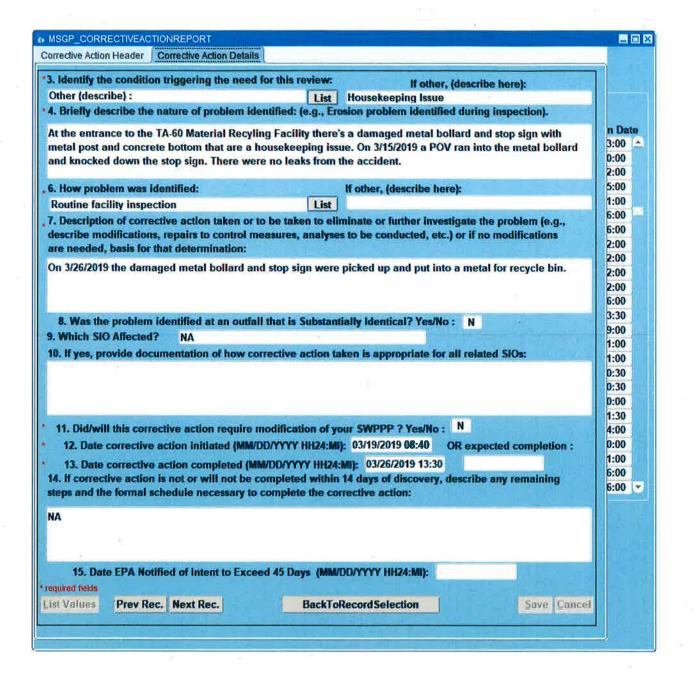
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained therein. Based on my inquiry of the person or persons 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.

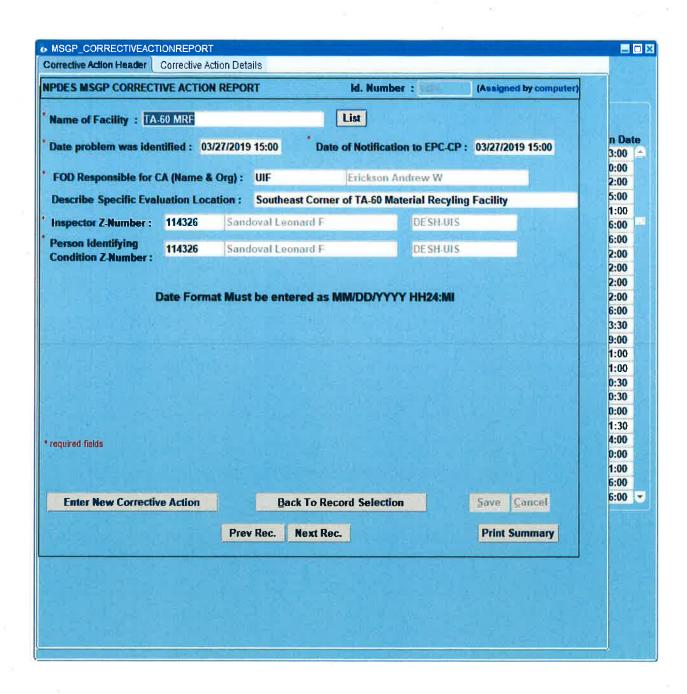
Printed Name: Rosell Stone	Title: ESH Mar 4 DESH-UIS
Signature: Musual Fer	Date:



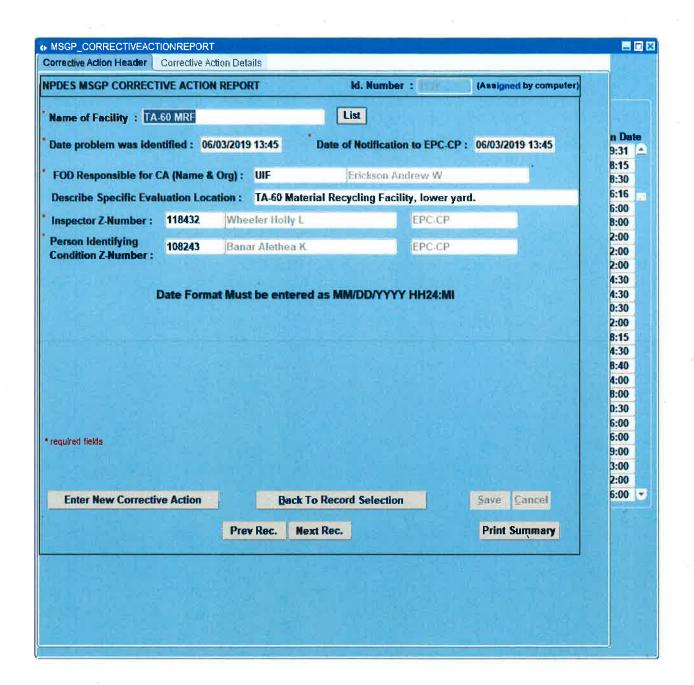


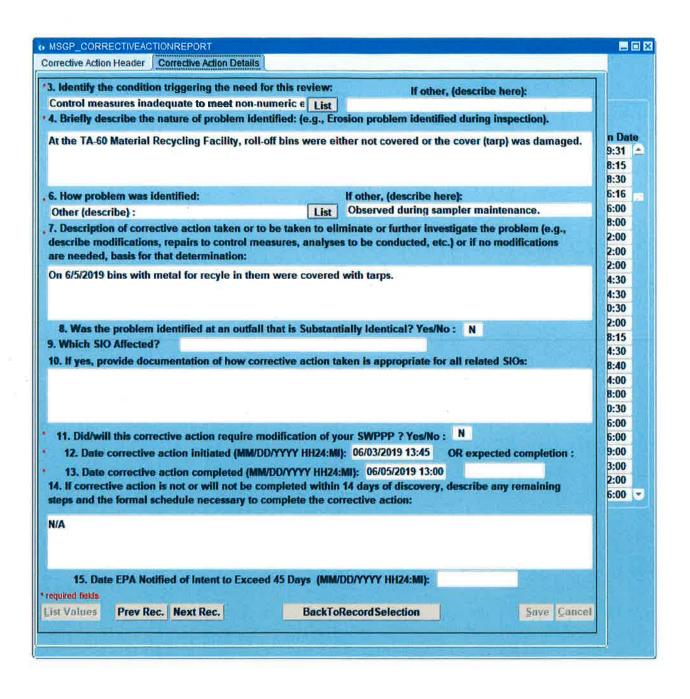


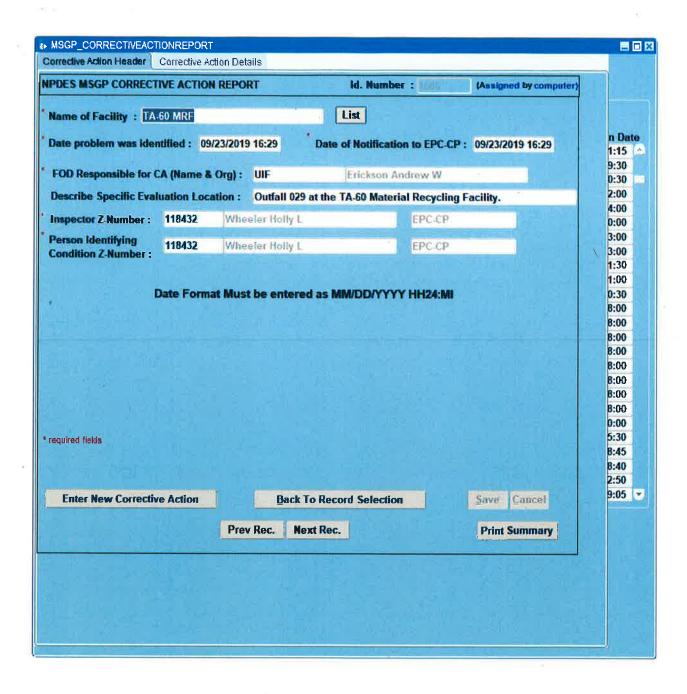


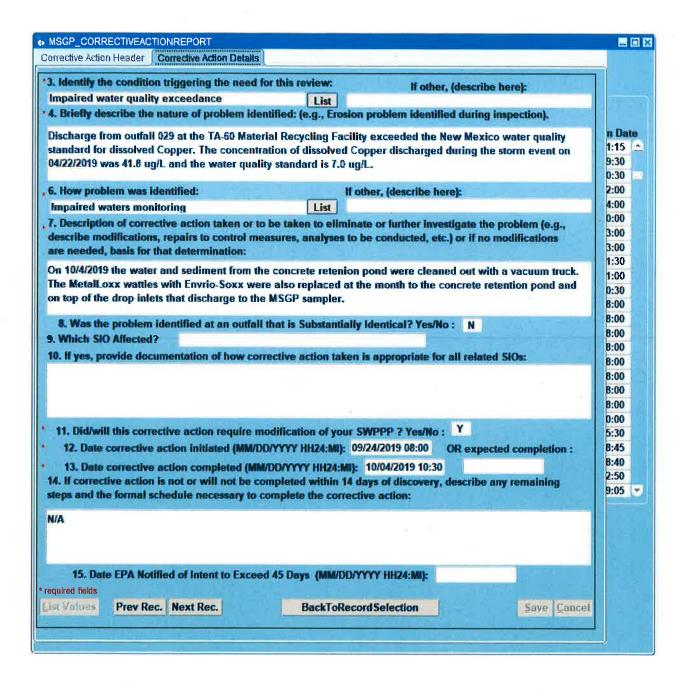


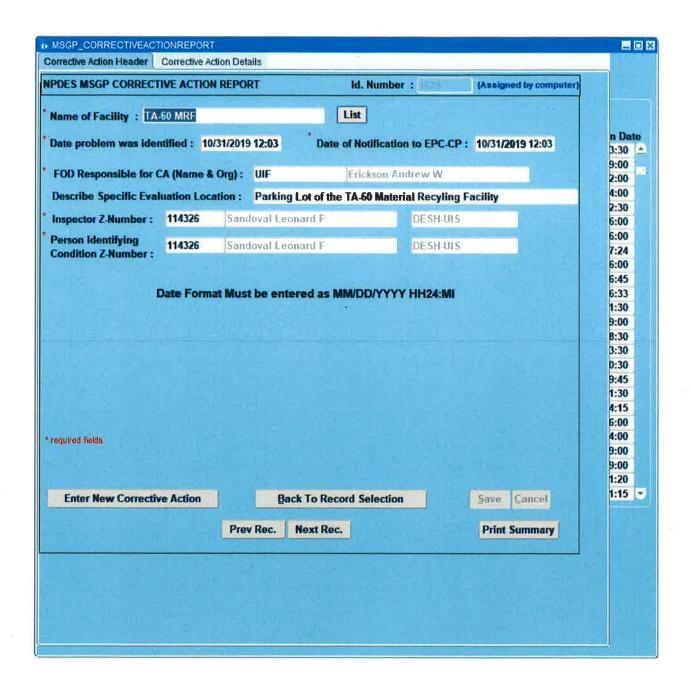
3. Identify the condition triggering the need for this review:  Unauthorized release or discharge  4. Briefly describe the nature of problem identified: (e.g., Erosion problem identified duri  On Wednesday evening March 27, 2019 a metal for recycle bin from TA-35-2 delivered to gallons of a water/oily mixture. Emergency Operations and HAZMMAT responded and use and micro-blaze as part of the initial clean up effort. The final clean up of the affected ar	ing inspection).
Unauthorized release or discharge  1. Briefly describe the nature of problem identified: (e.g., Erosion problem identified duri  On Wednesday evening March 27, 2019 a metal for recycle bin from TA-35-2 delivered to gallons of a water/oily mixture. Emergency Operations and HAZMMAT responded and use and micro-blaze as part of the initial clean up effort. The final clean up of the affected ar	ing inspection).
I. Briefly describe the nature of problem identified: (e.g., Erosion problem identified duri On Wednesday evening March 27, 2019 a metal for recycle bin from TA-35-2 delivered to pallons of a water/oily mixture. Emergency Operations and HAZMMAT responded and usi and micro-blaze as part of the initial clean up effort. The final clean up of the affected ar	
On Wednesday evening March 27, 2019 a metal for recycle bin from TA-35-2 delivered to pallons of a water/oily mixture. Emergency Operations and HAZMMAT responded and usund micro-blaze as part of the initial clean up effort. The final clean up of the affected ar	
jallons of a water/oily mixture. Emergency Operations and HAZMMAT responded and us and micro-blaze as part of the initial clean up effort. The final clean up of the affected ar	A HOT WILL A IN Date
	ed absorbent pads 3:00
i. How problem was identified: If other, (describe here):	5:00
Other (describe): List Leak from metal for recyle	The state of the s
7. Description of corrective action taken or to be taken to eliminate or further investigate describe modifications, repairs to control measures, analyses to be conducted, etc.) or if are needed, basis for that determination:	no modifications 6:00 2:00
On Wednesday evening March 27, 2019 a metal for recycle bin from TA-35-2 delivered to pallons of a water/oily mixture. Emergency Operations and HAZMMAT responded and use and micro-blaze as part of the initial clean up effort. The final clean up of the affected are ain was completed by Poads and Grounds on 3/29/2019	ed absorbent pads rea and metal roll off 6:00
8. Was the problem identified at an outfall that is Substantially Identical? Yes/No: N	9:00
. Which SIO Affected? NA 0. If yes, provide documentation of how corrective action taken is appropriate for all rela	ated SiOs:
in per provide decementation of non-confedera action taken is appropriate for an (cir	1:00 0:30
	0:30 0:00
11. Did/will this corrective action require modification of your SWPPP ? Yes/No :	1:30 4:00
12. Date corrective action initiated (MM/DD/YYYY HH24:MI): 03/27/2019 15:00 OR ex	pected completion : 0:00
13. Date corrective action completed (MM/DD/YYYY HH24:MI): 03/29/2019 11:00	1:00
4. If corrective action is not or will not be completed within 14 days of discovery, describites and the formal schedule necessary to complete the corrective action:	be any remaining 6:00 6:00
	100
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15. Date EPA Notified of Intent to Exceed 45 Days (MM/DD/YYYY HH24:MI): equired fields	
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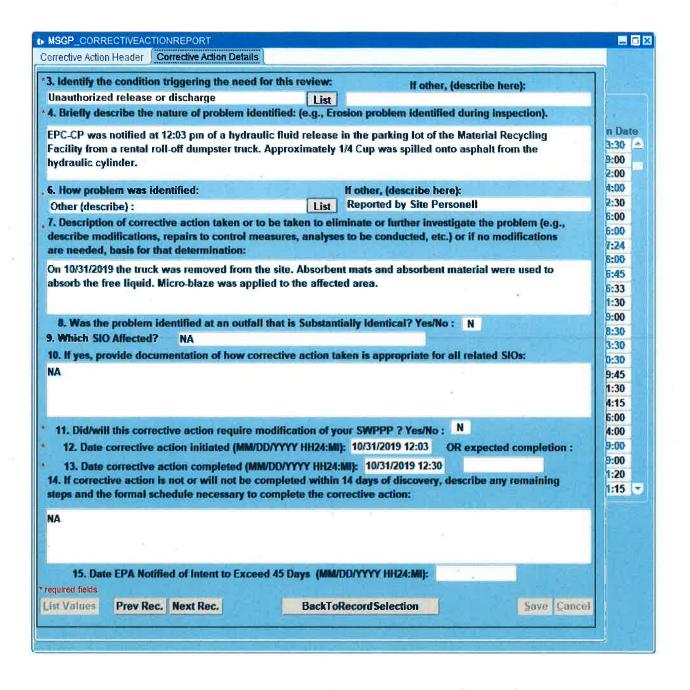


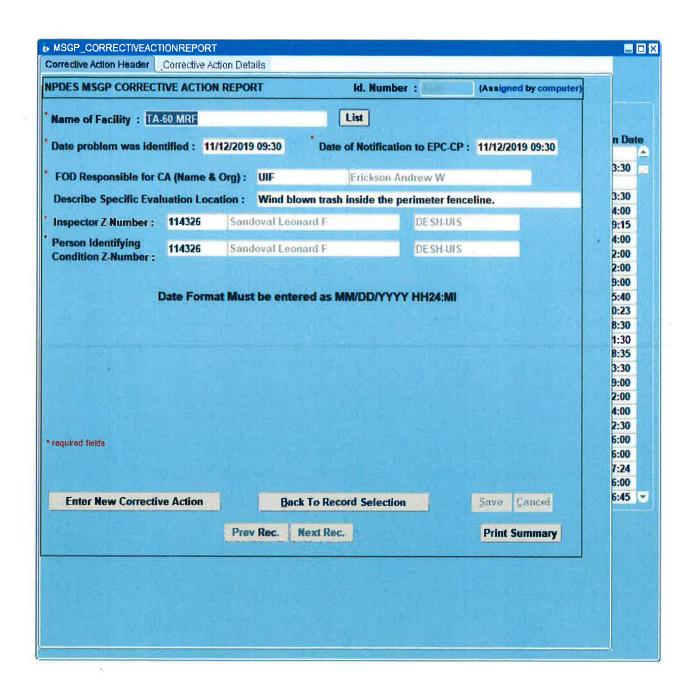


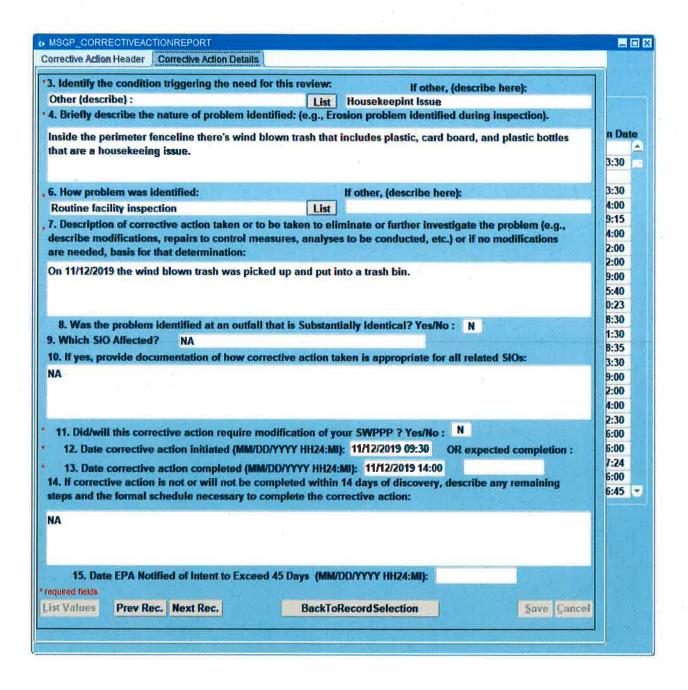


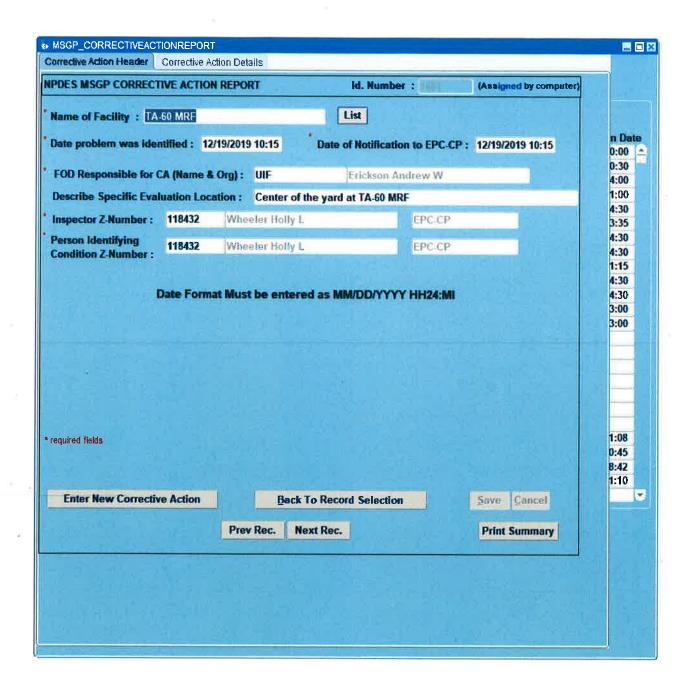


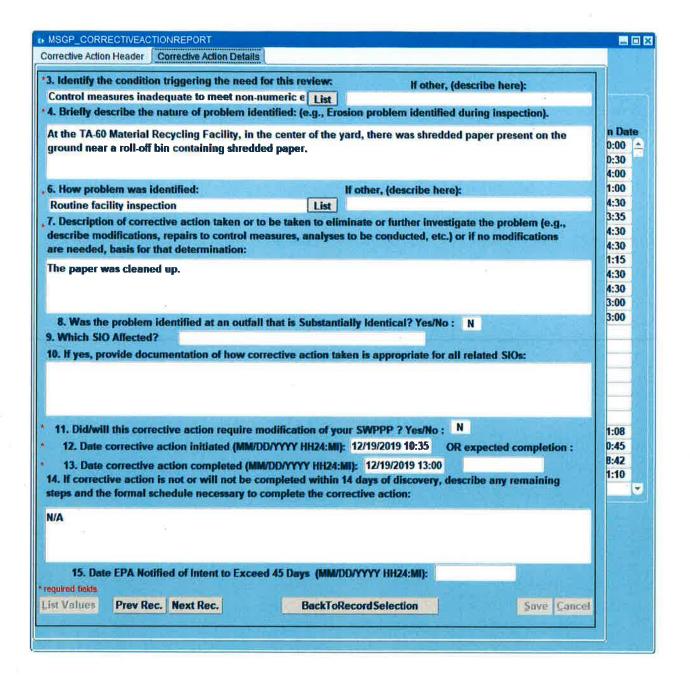


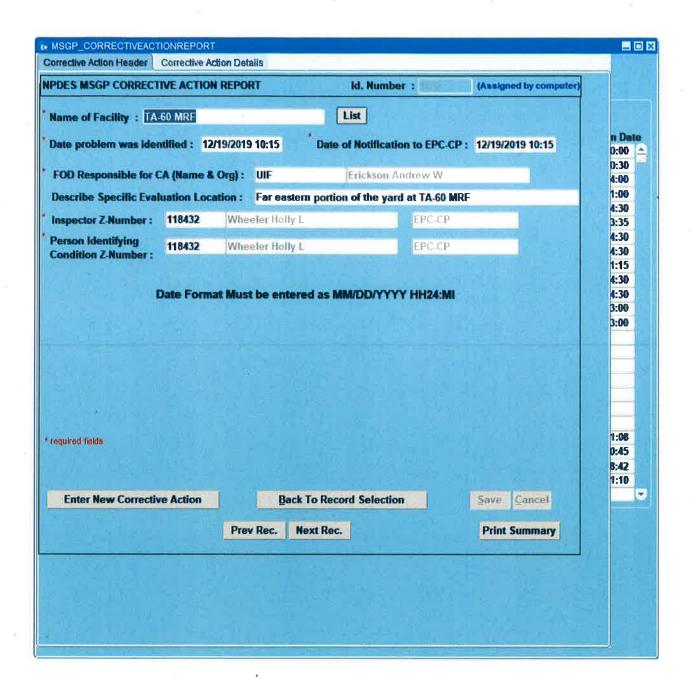


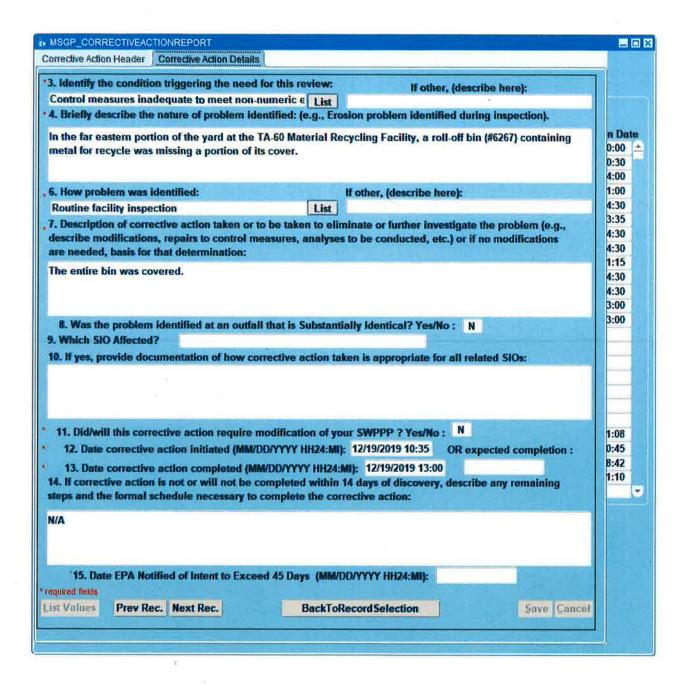








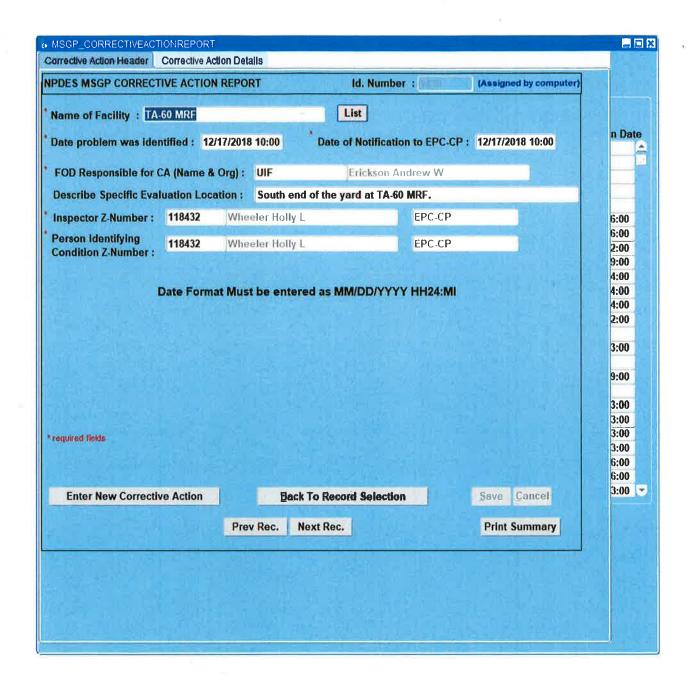


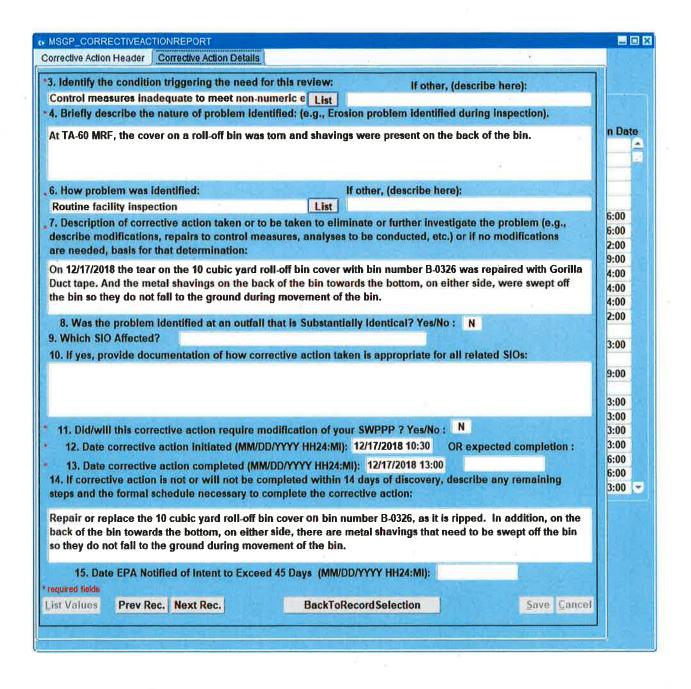


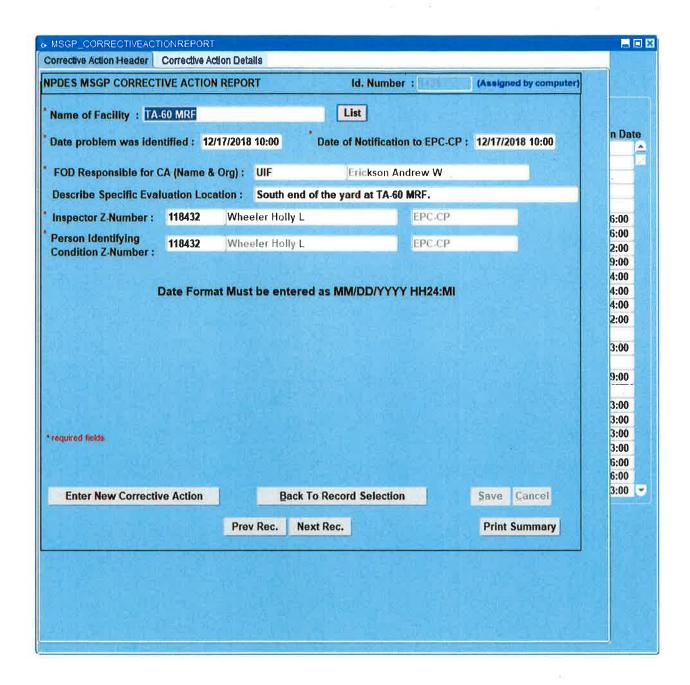
#### **CERTIFICATION FOR CORRECTIVE ACTIONS**

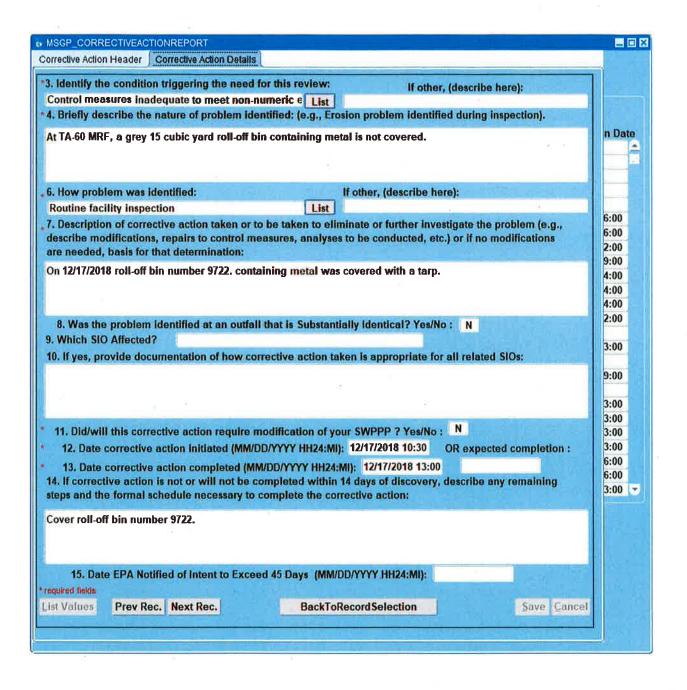
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained therein. Based on my inquiry of the person or persons 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.

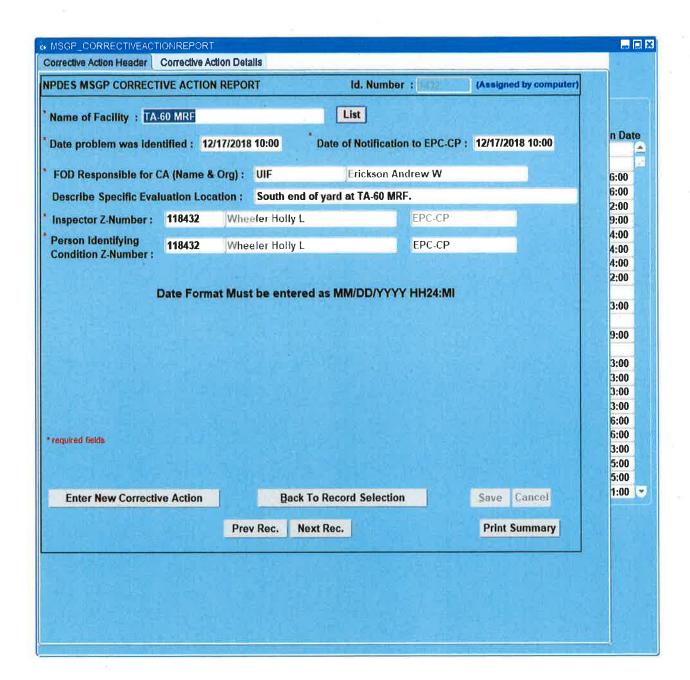
Printed Name: Russell Stone	Title: GC DESH-UIS
Signature: Ruce Str	_ Date:

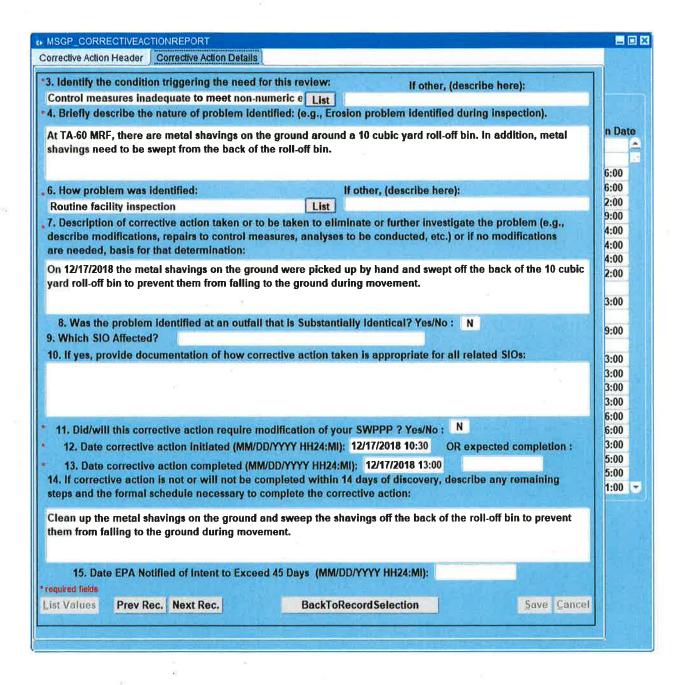












#### **ATTACHMENT 10: SCHEDULED MAINTENANCE LOG**

#### **SCHEDULED MAINTENANCE LOG**

#### **Control Measure or**

Date	Equipment Description	Action Taken/Comments	Action Taken By
4/22/2019	Concrete Retention Pond	Sediment and water were cleaned out	Jack Caldwell 116986
4/22/2019	Concrete Retention Pond and Drop Inlets	MetalLoxx with Enviro-Soxx Wattles were replaced	Jack Caldwell 116986
4/22/2019	Drop Inlets	Floc Logs were replaced	Jack Caldwell 116986
10/4/2019	Concrete Retention Pond	Sediment and water were cleaned out	Jack Caldwell 116986
10/4/2019	Concrete Retention Pond and Drop Inlets	MetalLoxx with Enviro-Soxx Wattles were replaced	Jack Caldwell 116986
10/4/2019	Drop Inlets	Floc Logs were replaced	Jack Caldwell 116986
4/1/2020	Concrete Retention Pond	Sediment and water were cleaned out	Jack Caldwell 116986
4/1/2020	Concrete Retention Pond and Drop Inlets	MetalLoxx with Enviro-Soxx Wattles were replaced	Jack Caldwell 116986
4/2/2020	Drop Inlets	Floc Logs were replaced	Jack Caldwell 116986
6/5/2020	End of culvert that discharges to the MSGP Sampler	MetalLoxx with Enviro-Soxx Wattles was installed	Jack Caldwell 116986
6/23/2020	Concrete Retention Pond and Drop Inlets	MetalLoxx with Enviro-Soxx Wattles were replaced	Jack Caldwell 116986
9/15/2020	Concrete Retention Pond and Drop Inlets	MetalLoxx with Enviro-Soxx Wattles were replaced	Jack Caldwell 116986
9/15/2020	End of culvert that discharges to the MSGP Sampler	MetalLoxx with Enviro-Soxx Wattles was replaced	Jack Caldwell 116986

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#### **ATTACHMENT 11: TRAINING DOCUMENTATION**



## **MSGP Training Overview**

Presented by the EPC-CP Stormwater Permitting/Compliance Team

April 2020





"GOSH, TOTO . . . WATER IN OZ MUST REALLY BE POLLUTED!"





#### What is the MSGP?

- A nation-wide general permit
- Authorizes the discharge of stormwater from specific industrial activities to meet Clean Water Act provisions
  - MSGP contains 30 industrial sectors
- EPA is the regulatory authority
  - NM Environment Department is delegated authority to conduct inspections





## **MSGP Industrial Sectors Within LANL**

- LANL (Triad) has 8 of the 30 industrial sectors
  - Asphalt Paving Manufacturing (Sector D)
  - Fabricated Metal Products (Sector AA)
  - Primary Metals (Sector F)
  - Timber Products (Sector A)
  - Scrap Recycling (Sector N)
  - Steam Electric Generation (Sector O)
  - Land Transportation/Warehousing (Sector P)
  - Hazardous Waste Treatment, Storage, or Disposal (Sector K)
- UI FOD has facilities in 6 of these sectors.





# What is the Purpose of the MSGP?

- Minimize off-site migration of pollutants!
  - Ensure controls are *always* adequate (not just after identification of condition requiring corrective action or exceedance of permit limit).





## What are the Key Elements of the MSGP?

- Storm Water Pollution Prevention Plan (SWPPP)
- Storm Water Sampling
- Analytical Monitoring
- Inspections
- Corrective Actions





## **Key Elements of the MSGP**

#### SWPPP

- Facility-specific document identifying how MSGP requirements will be met at the facility
  - All personnel implementing MSGP requirements must be trained to, and understand it
  - Identifies potential pollutant sources
  - Describes stormwater controls used to reduce/eliminate pollutants in discharges
  - Contains procedures the facility uses to comply with terms/conditions of the permit
  - Identifies the Pollution Prevention Team (PPT)





## **Pollution Prevention Team**

- Typically consists of the FOD/Designee, DESH Group Leader, Operations Manager, DEP, and the MSGP Program Lead
- Provides expertise to evaluate changes to the design of controls and facilitates action to resolve identified issues/conditions (i.e., Corrective Action)
- Assists with Stormwater Control Implementation
  - Design, install, and implement control measures (including best management practices) to minimize pollutant discharges and meet effluent limits





## **Pollution Prevention Team (cont.)**

- Stormwater Control Implementation (cont.)
  - Consider the following when selecting and designing control measures
    - Minimizing stormwater contact with potential pollutants
    - Using control measures in combination
    - Assessing the type and quantity of pollutants
    - Minimizing impervious areas and infiltrating runoff onsite
    - Attenuating flow using open vegetated swales and natural depressions
    - Conserving and/or restoring riparian buffers
    - Using treatment interceptors (e.g., vortex separators and sand filters)







## **MSGP Storm Water Sampling**



## What triggers a sample?

- A measureable storm event
  - One that results in an actual discharge
  - Proceed an event by at least 72-hours
- EPC-CP Database
  - Rainfall Data/Rain gages
  - Flow intensities at facilities





## How are samples collected?

- Automated Samplers
  - Avalanche (refrigerated)
  - Model 3700 (filtered)
- Grab Sample





## **Avalanche Sampler**



- MSGP requires sample collection to follow 40 CFR Part 136
- Some constituents require refrigeration as preservation within 15 minutes





# 3700 Sampler



 Other constituents require filtering within 15 minutes



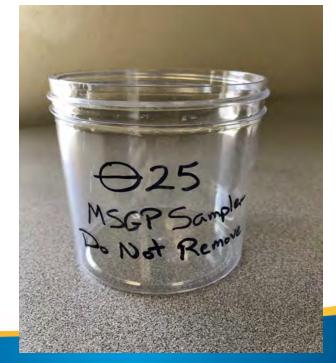


## Where are samples collected?

- Monitored Outfalls
  - Automated Samplers
- Substantially Identical Outfalls

Other outfalls that discharge substantially identical

effluent







# What types of samples are collected?

- Samples for analysis of monitored constituents
- Samples for field parameters
  - Visual Assessment
  - pH





#### **Collection and Preservation**

- Volume collected are based on 40 CFR 136 and identified in the SAP provided by EPC-CP
- Volumes from samplers are transferred to shipping containers (250mL, 500mL, 1L, etc.)
- Filter samples and add preservatives
- SMO ships to off-site analytical laboratory





### **Visual Assessments**

- Examination includes:
  - Odor
  - Color
  - Clarity
  - Floating solids
  - Settled solids
  - Suspended solids
  - Foam
  - Oil sheen
  - Other obvious indicators of storm water pollution







## **MSGP Analytical Monitoring**



## **Monitoring Requirements**

#### Why?

- To demonstrate that pollutants resulting from industrial activity are not being discharged from the site (or not exceeding numeric limits)
- Show effectiveness of stormwater control measures

#### What? Analytical monitoring types

- Benchmark
- Impaired Waters
- Effluent Limitation Guidelines (ELG)
- 103 Analytical Samples planned for MY20





## **Monitoring Requirements**

#### How?

- 40 CFR § 136
  - Defines Clean Water Act analytical methods, sample containers, volumes, preservatives, holding times, and cool samples immediately after collection and store < 6°C (42° F)</li>
- Laboratories performing analyses for NPDES certified under
  - National Environmental Laboratory Accreditation Program (NELAP)
  - DOE Consolidated Audit Program (DOECAP)
- 20.6.4 NMAC NM Water Quality Standards
  - Applies to Impaired Waters and some Benchmark parameters
  - Dissolved metals require 0.45 micron filtration
  - Total recoverable Al requires 10 micron filtration





# **Monitoring Frequency**

- When?
- Monitoring season April 1- Nov 30
  - 2-month quarters
  - Once per Quarter
    - Benchmark monitoring
  - Once per Year
    - Impaired Waters
    - Effluent Limitation Guidelines (ELG)





## **Benchmarks**

#### Parameters are sector-specific – based on industrial activity

Sector	Industrial Activity	Parameter(s)	Facilities
Α	Timber Products	COD, TSS	TA-3-38 Carpenter Shop
AA	Fabricated Metals	Al, Fe, Zn, NO2-+NO3-N	TA-3-38 Metals Fab Shop TA-60-1 Heavy Equipment Yard
D	Asphalt Paving	pH, TSS, Oil and Grease	TA-60 Asphalt Batch Plant
N	Scrap Recycling	N/A for subsector	TA-60 MRF
0	Steam Electric Power	Fe	TA-3-22 Power & Steam Plant
Р	Land Transportation/ Warehousing	N/A	TA-16 Stockpile Yard TA-60-1 Heavy Equipment Yard TA-60-2 Warehouse TA-60 Roads and Grounds

Slide 23



#### **New for next permit:**

- Universal benchmarks for <u>all</u> sectors: pH, TSS, COD
- Fe dropped from Sector AA, O
- Hg and Pb added to Sector P





## **Benchmark Limits**

#### Benchmark limits provided in permit

Superseded by NM WQS if different

Analyte	Field Prep Code	National Benchmark	Chronic Exposure Limit	Acute Exposure Limit	Units	Regulatory Source
AI*	F10U	750	1010	2520	ug/L	20.6.4.900 NMAC Subpart I
COD	UF	120	120	120	mg/L	NMR053195 Sect 9.6.2.1
Fe	UF	1000	1000	1000	ug/L	NMR053195 Sect 9.6.2.1
Hg	UF	1.4	0.77	0.77	ug/L	20.6.4.900 NMAC Subpart J
NO3+NO2-N	UF	0.68	0.68	0.68	mg/L	NMR053195 Sect 9.6.2.1
Pb‡*	UF	210	2	51	ug/L	20.6.4.900 NMAC Subpart I
рН	UF	6-9	6-9	6-9	SU	NMR053195 Sect 9.6.2.1
TSS	UF	100	100	100	mg/L	NMR053195 Sect 9.6.2.1
Zn*‡	F	110	76	101	ug/L	20.6.4.900 NMAC Subpart I

<sup>\*</sup> NM water quality hardness-based values replace Appendix J as benchmarks.

NM WQS more stringent than benchmark

NM WQS is less stringent than benchmark





<sup>‡</sup> National benchmark applies to total (unfiltered) result; NM water quality benchmark applies to dissolved (filtered) result.

## **Data Evaluation - Benchmarks**

- Evaluate the average of 4 quarterly results against the benchmark
- Exceedances: triggers corrective action process
  - average of 4 results > benchmark or
  - average of fewer than 4 results is mathematically certain to exceed benchmark
- If average of 4 < benchmark, discontinue monitoring</li>





## **Benchmark Exceedances**

2016-2018 LANS permit data

			T									
			Field	QBM			Minimum		Analysis	Maximum		
			Prep	Sequence		Actual Result		Report	Results	Adjusted	MSGP QBM	MSGP QBM
Permitted Facility TA-3-38 Metals Fab Shop	Location ID MSGP00201	Analyte Name Iron, total	UF		Sample Date		Average	Units ug/L	Count	Result	Predicted Predicted	Level
TA-3-38 Metals Fab Shop	MSGP00201	Iron, total	UF	1	06/04/2016		1477.5	ug/L ug/L	2	3640.0	Predicted	1000.0
•			UF	2	08/04/2016		1215.0	-	1	4860.0		1000.0
TA-3-38 Metals Fab Shop	MSGP00201	Iron, total	UF	3	04/04/2017		1957.0	ug/L	2	7370.0	Predicted	1000.0
TA-3-38 Metals Fab Shop	MSGP00201	Iron, total	0.	4	10/05/2017		1050.0	ug/L	3	1520.0	Predicted	1000.0
TA-3-38 Metals Fab Shop	MSGP00201	Iron, total	UF	5	08/02/2018		385.5	ug/L	2	1330.0		1000.0
TA-3-38 Metals Fab Shop	MSGP00201	Aluminum, total recoverable	F10u	1	08/04/2016			-	3	2770.0	Predicted	681.0
TA-3-38 Metals Fab Shop	MSGP00201	Aluminum, total recoverable	F10u	2	10/05/2017				4	1280.0	True Value	681.0
TA-3-38 Metals Fab Shop	MSGP00201	Aluminum, total recoverable	F10u	3	08/02/2018		448.25	<u> </u>	2	1550.0		681.0
TA-3-38 Metals Fab Shop	MSGP00201	Zinc, dissolved	F	1	10/08/2016				4	324.0	True Value	76.0
TA-3-38 Metals Fab Shop	MSGP00201	Zinc, dissolved	F	2	06/01/2017	194.5	97.25	ug/L	2	250.0	Predicted	76.0
TA-3-38 Metals Fab Shop	MSGP00201	Zinc, dissolved	F	3	07/05/2018	171.933	128.95	-	3	285.0	Predicted	76.0
TA-3-38 Metals Fab Shop	MSGP00201	Zinc, dissolved	F	4	08/02/2018	78.0	19.5	ug/L	1	78.0		76.0
TA-3-39 & 102 Metal Shop	MSGP00401	Iron, total	UF	1	06/27/2016	4105.0	2052.5	ug/L	2	6620.0	Predicted	1000.0
TA-3-39 & 102 Metal Shop	MSGP00401	Iron, total	UF	2	05/09/2017	4035.0	2017.5	ug/L	2	6650.0	Predicted	1000.0
TA-3-39 & 102 Metal Shop	MSGP00401	Nitrate plus Nitrite Nitrogen	UF	1	08/03/2016	1.178	0.883	mg/L	3	2.66	Predicted	0.68
TA-3-39 & 102 Metal Shop	MSGP00401	Nitrate plus Nitrite Nitrogen	UF	2	05/09/2017	0.733	0.183	mg/L	1	0.733		0.68
TA-3-39 & 102 Metal Shop	MSGP00401	Aluminum, total recoverable	F10u	1	04/18/2016	9060.0	2265.0	ug/L	1	9060.0	Predicted	1699.0
TA-3-39 & 102 Metal Shop	MSGP00401	Aluminum, total recoverable	F10u	2	05/09/2017	2822.667	2117.0	ug/L	3	6570.0	Predicted	1699.0
TA-3-39 & 102 Metal Shop	MSGP00401	Zinc, dissolved	F	1	04/01/2017	13.45	13.45	ug/L	4	20.5		101.0
TA-3-22 Power & Steam Plant	MSGP00501	Iron, total	UF	1	07/01/2016	9980.0	2495.0	ug/L	1	9980.0	Predicted	1000.0
TA-3-22 Power & Steam Plant	MSGP00501	Iron, total	UF	2	07/15/2016	4450.0	1112.5	ug/L	1	4450.0	Predicted	1000.0
TA-3-22 Power & Steam Plant	MSGP00501	Iron, total	UF	3	04/04/2017	7566.0	5674.5	ug/L	3	20700.0	Predicted	1000.0
TA-3-22 Power & Steam Plant	MSGP00501	Iron, total	UF	4	08/07/2017	3010.0	1505.0	ug/L	2	3270.0	Predicted	1000.0
TA-3-22 Power & Steam Plant	MSGP00501	Iron, total	UF	5	05/21/2018	4620.0	2310.0	ug/L	2	6410.0	Predicted	1000.0
TA-3-22 Power & Steam Plant	MSGP00501	Iron, total	UF	6	08/03/2018	269.0	134.5	ug/L	2	367.0		1000.0
TA-3-22 Power & Steam Plant	MSGP00901	Iron, total	UF	1	06/07/2016		2007.5	ug/L	2	5240.0	Predicted	1000.0
TA-3-22 Power & Steam Plant	MSGP00901	Iron, total	UF	2	04/01/2017	1772.333	1329.25	ug/L	3	3600.0	Predicted	1000.0
TA-3-22 Power & Steam Plant	MSGP00901	Iron, total	UF	3	10/05/2017			ug/L	3	2390.0	Predicted	1000.0
TA-3-22 Power & Steam Plant	MSGP00901	Iron, total	UF	4	08/03/2018		541.25	<u> </u>	2	1800.0		1000.0
TA-60 Asphalt Batch Plant	MSGP04301	Total Suspended Solids (TSS)	UF	1	10/05/2017		6.85	· .	1	27.4		100.0
		32552322 (30)			10/00/2017	21.7	5.03			21.7		100.0
TA-3-38 Carpenter Shop	MSGP07302	Chemical Oxygen Demand (COD)	UF	1	07/26/2017	271.75	135.875	mg/L	2	463.0	Predicted	120.0
TA-3-38 Carpenter Shop	MSGP07302	Chemical Oxygen Demand (COD)	UF	2	08/16/2018	101.0	50.5	mg/L	2	202.0		120.0
TA-3-38 Carpenter Shop	MSGP07302	Total Suspended Solids (TSS)	UF	1	08/16/2018	123.683	92.763	mg/L	3	188.0		100.0







# New: Additional Implementation Measures – Tiered Corrective Action Levels

based on nature and magnitude of benchmark exceedances

- Tier 1
  - a. One Annual Average > benchmark (<u>same as current permit</u>)
    - Average of 4 results exceeds benchmark
    - Average of fewer than 4 results is mathematically certain to exceed benchmark
  - b. One single result > 4X benchmark
- Tier 2
  - Two Annual Averages > benchmark
  - b. Two single results > 4x benchmark in 2 year period
  - c. One single result > 8x benchmark
- Tier 3
  - a. Three Annual Averages > benchmark
  - Three single results > 4x benchmark in 3 year period
  - C. Two single results > 8x benchmark in 3 year period
  - d. 4 consecutive results are each > benchmark <u>and</u> the average is > 2 times benchmark
- Can discontinue monitoring if the average of 4 results < benchmark (does <u>not</u> apply to new Universal benchmarks)





# Preview of Corrective Action Status with Tiered Corrective Action Levels

2019 Triad permit data

Permitted Facility	MSGP Station Number	Report Type		Field Prep Code	QBM Seque nce No.		Adjusted Result Average		Report Units	,	Adjusted		MSGP QBM Exceedance	MSGP QBM Level	Maximum Adjusted Result > QBM	Tier
TA-3-22 Power & Steam Plant	MSGP00501	MSGP QBM	Iron, total	UF	1	06/15/2019	3783.0	1891.5	ug/L	2	916.0	6650.0	Predicted	1000.0	Υ	1b
TA-3-22 Power & Steam Plant	MSGP00501	MSGP QBM	Iron, total	UF	2	08/07/2019	54900.0	13725.0	ug/L	1	54900.0	54900.0	Predicted	1000.0	Υ	2c
TA-3-22 Power & Steam Plant	MSGP00501	MSGP QBM	Iron, total	UF	3	10/04/2019	4610.0	1152.5	ug/L	1	4610.0	4610.0	Predicted	1000.0	Υ	3b
TA-3-22 Power & Steam Plant	MSGP00901	MSGP QBM	Iron, total	UF	1	04/23/2019	5290.0	1322.5	ug/L	1	5290.0	5290.0	Predicted	1000.0	Υ	1b
TA-3-22 Power & Steam Plant	MSGP00901	MSGP QBM	Iron, total	UF	2	08/08/2019	3345.0	1672.5	ug/L	2	3220.0	3470.0	Predicted	1000.0	Υ	2b
TA-3-22 Power & Steam Plant	MSGP00901	MSGP QBM	Iron, total	UF	3	10/04/2019	3620.0	905.0	ug/L	1	3620.0	3620.0		1000.0	Υ	
TA-3-38 Carpenter Shop	MSGP07401	MSGP QBM	Chemical Oxygen Demand (COD)	UF	1	10/04/2019	54.675	54.675	mg/L	4	0.0	106.0		120.0	N	
TA-3-38 Carpenter Shop	MSGP07401	MSGP QBM	Total Suspended Solids (TSS)	UF	1	10/04/2019	78.55	78.55	mg/L	4	21.2	114.0		100.0	Υ	
TA-3-38 Metals Fab Shop	MSGP00201	MSGP QBM	Aluminum, total recoverable	F10u	1	04/22/2019	222.0	55.5	ug/L	1	222.0	222.0		1010.0	N	
TA-3-38 Metals Fab Shop	MSGP00201	MSGP QBM	Iron, total	UF	1	04/22/2019	7550.0	1887.5	ug/L	1	7550.0	7550.0	Predicted	1000.0	Υ	1b
TA-3-38 Metals Fab Shop	MSGP00201	MSGP QBM	Nitrate plus Nitrite Nitrogen	UF	1	04/22/2019	1.12	0.28	mg/L	1	1.12	1.12		0.68	Υ	
TA-3-38 Metals Fab Shop	MSGP00201	MSGP QBM	Zinc, dissolved	F	1	04/22/2019	387.0	96.75	ug/L	1	387.0	387.0		99.0	Υ	
TA-3-38 Metals Fab Shop	MSGP07601	MSGP QBM	Aluminum, total recoverable	F10u	1	10/04/2019	81128.667	60846.5	ug/L	3	896.0	241000.0	Predicted	1010.0	Υ	2c
TA-3-38 Metals Fab Shop	MSGP07601	MSGP QBM	Iron, total	UF	1	08/06/2019	2365.0	1182.5	ug/L	2	1390.0	3340.0	Predicted	1000.0	Υ	1a
TA-3-38 Metals Fab Shop	MSGP07601	MSGP QBM	Iron, total	UF	2	10/04/2019	7400.0	1850.0	ug/L	1	7400.0	7400.0	Predicted	1000.0	Υ	1b
TA-3-38 Metals Fab Shop	MSGP07601	MSGP QBM	Nitrate plus Nitrite Nitrogen	UF	1	10/04/2019	0.656	0.492	mg/L	3	0.393	0.82		0.68	Υ	
TA-3-38 Metals Fab Shop	MSGP07601	MSGP QBM	Zinc, dissolved	F	1	10/04/2019	470.333	352.75	ug/L	3	135.0	1110.0	Predicted	99.0	Υ	2c
TA-60 Asphalt Batch Plant	MSGP04301	MSGP QBM	Total Suspended Solids (TSS)	UF	1	08/07/2019	101.0	50.5	mg/L	2	61.0	141.0		100.0	Υ	
TA-60-1 Heavy Equipment Yard	MSGP02201	MSGP QBM	Aluminum, total recoverable	F10u	1	04/22/2019	14900.0	3725.0	ug/L	1	14900.0	14900.0	Predicted	1010.0	Υ	2c
TA-60-1 Heavy Equipment Yard	MSGP02201	MSGP QBM	Aluminum, total recoverable	F10u	2	10/04/2019	1596.667	1197.5	ug/L	3	1430.0	1860.0	Predicted	1010.0	Υ	1a
TA-60-1 Heavy Equipment Yard	MSGP02201	MSGP QBM	Iron, total	UF	1	07/02/2019	4910.0	2455.0	ug/L	2	1300.0	8520.0	Predicted	1000.0	Υ	2c
TA-60-1 Heavy Equipment Yard	MSGP02201	MSGP QBM	Iron, total	UF	2	10/04/2019	1090.0	545.0	ug/L	2	1080.0	1100.0		1000.0	Υ	
TA-60-1 Heavy Equipment Yard	MSGP02201	MSGP QBM	Nitrate plus Nitrite Nitrogen	UF	1	08/06/2019	1.131	0.848	mg/L	3	0.742	1.48	Predicted	0.68	Υ	1a
TA-60-1 Heavy Equipment Yard	MSGP02201	MSGP QBM	Nitrate plus Nitrite Nitrogen	UF	2	10/04/2019	0.642	0.161	mg/L	1	0.642	0.642		0.68	N	
TA-60-1 Heavy Equipment Yard	MSGP02201	MSGP QBM	Zinc, dissolved	F	1	04/22/2019	657.0	164.25	ug/L	1	657.0	657.0	Predicted	99.0	Υ	1b
TA-60-1 Heavy Equipment Yard	MSGP02201	MSGP QBM	Zinc, dissolved	F	2	10/04/2019	114.533	85.9	ug/L	3	82.6	148.0		99.0	Υ	

Tier 1 Tier 2 Tier 3





### **Impaired Waters**

Parameters and limits are receiving-water specific

 – CWA 303d/305b Integrated Report is revised by NMED biennially (next revision due late 2020)

Assessment Unit	Description	Parameter(s)	Facility
NM-9000.A_047 (perennial flow - chronic exposure risk)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	Al, Cu, PCBs	TA-3-22 Power & Steam Plant TA-3-38 Carpenter Shop TA-3-38 Metals Fab Shop TA-60 MRF TA-60-1 Heavy Equipment Yard TA-60-2 Warehouse TA-60 Roads and Grounds
NM-9000.A_042 (ephemeral flow – acute exposure risk)	Mortandad Canyon (within LANL)	Cu, Hg, PCBs, Adjusted Gross Alpha	TA-60-Asphalt Batch Plant TA-60 Roads and Grounds
NM-128.A_01 (ephemeral flow - acute exposure risk)	Canon de Valle (below LANL gage E256)	Adjusted Gross Alpha	TA-16 Stockpile Yard





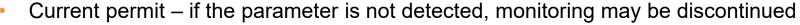
#### **Impaired Waters Limits**

20.6.4 NMAC – Water Quality Standards Limits are risk-based by exposure type

Parameter	Field Prep Code	Chronic Exposure Limit	Acute Exposure Limit	Units	Regulatory Source
Al	F10U	1010	2520	ug/L	20.6.4.900 NMAC Subpart I
Cu	F	7	11	ug/L	20.6.4.900 NMAC Subpart I
Hg	UF	0.77	0.77	ug/L	20.6.4.900 NMAC Subpart J
Pb	F	2	51	ug/L	20.6.4.900 NMAC Subpart I
GROSSA-Adj	UF	15	15	pCi/L	20.6.4.900 NMAC Subpart J
Tot Aroclor	UF	0.2	0.2	ug/L	20.6.4.900 NMAC Subpart J/ 20.6.4.12 Subpart E

Lower WQS limit for chronic exposure
Higher WQS limit for acute exposure

Any WQS exceedance is a permit violation and triggers the corrective action process











## **Exceedances-Impaired Waters**

#### 2019 Triad permit data

Permitted Facility	MSGP Station Number	Report Type	Level Type	Analyte Name	Field Prep Code	Current Mon Status	Last Mon Sample Date	Report Units	Analysis Results Count	Detected Results Count	Minimum Adjusted Result	Maximum Adjusted Result	MSGP I Level	Maximum Adjusted Result > I
TA-3-22 Power & Steam Plant	MSGP00501	MSGPI	NM 2010 Aqu Chronic 80 mg	Aluminum, total recoverable	F10u	Mon	4/22/2019	ug/L	1	1	18300	18300	1010	Y
TA-3-22 Power & Steam Plant	MSGP00501	MSGPI	2007 EPA R6 MQL	Aroclor, total	UF	NMM	4/22/2019	ug/L	1	0		0	0.2	Ν
TA-3-22 Power & Steam Plant	MSGP00501	MSGPI	NM 2010 Aqu Chronic 80 mg	Copper, dissolved	F	Mon	4/22/2019	ug/L	1	1	15.9	15.9	7	Υ
TA-3-22 Power & Steam Plant	MSGP00901	MSGPI	NM 2010 Aqu Chronic 80 mg	Aluminum, total recoverable	F10u	Mon	4/23/2019	ug/L	1	1	6550	6550	1010	Y
TA-3-22 Power & Steam Plant	MSGP00901	MSGPI	2007 EPA R6 MQL	Aroclor, total	UF	NMM	4/23/2019	ug/L	1	0		0	0.2	z
TA-3-22 Power & Steam Plant	MSGP00901	MSGPI	NM 2010 Aqu Chronic 80 mg	Copper, dissolved	F	Mon	4/23/2019	ug/L	1	1	11.9	11.9	7	Υ
TA-3-22 Power & Steam Plant	MSGP01201	MSGPI	NM 2010 Aqu Chronic 80 mg	Copper, dissolved	F	Mon	7/25/2019	ug/L	1	1	13.5	13.5	7	Υ
TA-3-38 Carpenter Shop	MSGP07401	MSGP I	NM 2010 Aqu Chronic 80 mg	Aluminum, total recoverable	F10u	Mon	5/10/2019	ug/L	1	1	728	728	1010	N
TA-3-38 Carpenter Shop	MSGP07401	MSGPI	2007 EPA R6 MQL	Aroclor, total	UF	NMM	5/10/2019	ug/L	1	0		0	0.2	Z
TA-3-38 Carpenter Shop	MSGP07401	MSGP I	NM 2010 Aqu Chronic 80 mg	Copper, dissolved	F	Mon	5/10/2019	ug/L	1	1	2.94	2.94	7	Z
TA-3-38 Metals Fab Shop	MSGP00201	MSGPI	NM 2010 Aqu Chronic 80 mg	Aluminum, total recoverable	F10u	NoRpt	4/22/2019	ug/L	1	1	222	222	1010	Ν
TA-3-38 Metals Fab Shop	MSGP00201	MSGPI	NM 2010 Aqu Chronic 80 mg	Copper, dissolved	F	NoRpt	4/22/2019	ug/L	1	1	24.9	24.9	7	Υ
TA-3-38 Metals Fab Shop	MSGP07601	MSGPI	NM 2010 Aqu Chronic 80 mg	Aluminum, total recoverable	F10u	Mon	6/17/2019	ug/L	1	1	1490	1490	1010	Υ
TA-3-38 Metals Fab Shop	MSGP07601	MSGPI	2007 EPA R6 MQL	Aroclor, total	UF	NMM	6/17/2019	ug/L	1	0		0	0.2	N
TA-60 Asphalt Batch Plant	MSGP04301	MSGP I	NM 2010 Lvstk Wtr	Adjusted Gross Alpha	UF	Mon	7/25/2019	pCi/L	1	1	3.96	3.96	15	Ν
TA-60 Asphalt Batch Plant	MSGP04301	MSGPI	2007 EPA R6 MQL	Aroclor, total	UF	NMM	7/25/2019	ug/L	1	0		0	0.2	N
TA-60 Asphalt Batch Plant	MSGP04301	MSGP I	NM 2010 Aqu Acute 80 mg	Copper, dissolved	F	Mon	7/25/2019	ug/L	1	1	3.1	3.1	11	Ν
TA-60 Asphalt Batch Plant	MSGP04301	MSGPI	NM 2010 Widlf Hab	Mercury, total	UF	NMM	7/25/2019	ug/L	1	0		0	0.77	Ν
TA-60 MRF	MSGP02901	MSGP I	NM 2010 Aqu Chronic 80 mg	Aluminum, total recoverable	F10u	Mon	4/22/2019	ug/L	1	1	816	816	1010	Z
TA-60 MRF	MSGP02901	MSGPI	2007 EPA R6 MQL	Aroclor, total	UF	NMM	4/22/2019	ug/L	1	0		0	0.2	Ν
TA-60 MRF	MSGP02901	MSGPI	NM 2010 Aqu Chronic 80 mg	Copper, dissolved	F	Mon	4/22/2019	ug/L	1	1	41.8	41.8	7	Υ
TA-60 Roads and Grounds	MSGP03101	MSGP I	NM 2010 Lvstk Wtr	Adjusted Gross Alpha	UF	Mon	7/25/2019	pCi/L	1	1	0.495	0.495	15	N
TA-60 Roads and Grounds	MSGP03101	MSGPI	2007 EPA R6 MQL	Aroclor, total	UF	NMM	7/25/2019	ug/L	1	0		0	0.2	z
TA-60 Roads and Grounds	MSGP03101	MSGP I	NM 2010 Aqu Acute 80 mg	Copper, dissolved	F	Mon	7/25/2019	ug/L	1	1	8	8	11	Ν
TA-60 Roads and Grounds	MSGP03101	MSGPI	NM 2010 Widlf Hab	Mercury, total	UF	NMM	7/25/2019	ug/L	1	0		0	0.77	Z
TA-60 Roads and Grounds	MSGP03201	MSGP I	NM 2010 Aqu Chronic 80 mg	Copper, dissolved	F	Mon	4/22/2019	ug/L	1	1	5.14	5.14	7	N
TA-60 Roads and Grounds	MSGP03201	MSGPI	NM 2010 Aqu Chronic 80 mg	Aluminum, total recoverable	F10u	Mon	4/30/2019	ug/L	1	1	1380	1380	1010	Υ
TA-60 Roads and Grounds	MSGP03201	MSGPI	2007 EPA R6 MQL	Aroclor, total	UF	NMM	4/30/2019	ug/L	1	0		0	0.2	N
TA-60 Roads and Grounds	MSGP03701	MSGPI	NM 2010 Aqu Chronic 80 mg	Aluminum, total recoverable	F10u	Mon	7/26/2019	ug/L	1	1	6580	6580	1010	Υ
TA-60 Roads and Grounds	MSGP03701	MSGPI	2007 EPA R6 MQL	Aroclor, total	UF	NMM	7/26/2019	ug/L	1	0		0	0.2	Z
TA-60 Roads and Grounds	MSGP03701	MSGP I	NM 2010 Aqu Chronic 80 mg	Copper, dissolved	F	Mon	7/26/2019	ug/L	1	1	3.23	3.23	7	N
TA-60 Roads and Grounds	MSGP03901	MSGPI	NM 2010 Aqu Chronic 80 mg	Copper, dissolved	F	Mon	7/25/2019	ug/L	1	1	7.74	7.74	7	Υ
TA-60 Roads and Grounds	MSGP04201	MSGPI	NM 2010 Aqu Chronic 80 mg	Aluminum, total recoverable	F10u	Mon	4/23/2019	ug/L	1	1	2050	2050	1010	Υ
TA-60 Roads and Grounds	MSGP04201	MSGPI	2007 EPA R6 MQL	Aroclor, total	UF	NMM	4/23/2019	ug/L	1	0		0	0.2	Ν
TA-60 Roads and Grounds	MSGP04201	MSGP I	NM 2010 Aqu Chronic 80 mg	Copper, dissolved	F	Mon	4/23/2019	ug/L	1	1	4.75	4.75	7	Ν
TA-60-1 Heavy Equipment Yard	MSGP02201	MSGPI	NM 2010 Aqu Chronic 80 mg	Aluminum, total recoverable	F10u	Mon	4/22/2019	ug/L	1	1	14900	14900	1010	Υ
TA-60-1 Heavy Equipment Yard	MSGP02201	MSGPI	2007 EPA R6 MQL	Aroclor, total	UF	NMM	4/22/2019	ug/L	1	0		0	0.2	N
TA-60-1 Heavy Equipment Yard	MSGP02201	MSGPI	NM 2010 Aqu Chronic 80 mg	Copper, dissolved	F	Mon	4/22/2019	ug/L	1	1	13.4	13.4	7	Υ
TA-60-2 Warehouse	MSGP02601	MSGPI	NM 2010 Aqu Chronic 80 mg	Aluminum, total recoverable	F10u	Mon	4/1/2019	ug/L	1	1	2350	2350	1010	Υ
ΓA-60-2 Warehouse	MSGP02601	MSGPI	2007 EPA R6 MQL	Aroclor, total	UF	NMM	4/1/2019	ug/L	1	0		0	0.2	N
ΓA-60-2 Warehouse	MSGP02601	MSGPI	NM 2010 Aqu Chronic 80 mg	Copper, dissolved	F	Mon	4/1/2019	ug/L	1	1	9.67	9.67	7	Υ
ΓA-60-2 Warehouse	MSGP07501	MSGPI	NM 2010 Aqu Chronic 80 mg	Aluminum, total recoverable	F10u	Mon	4/22/2019	ug/L	1	1	5760	5760	1010	Υ
TA-60-2 Warehouse	MSGP07501	MSGPI	2007 EPA R6 MQL	Aroclor, total	UF	NMM	4/22/2019	ug/L	1	0		0	0.2	N
TA-60-2 Warehouse	MSGP07501	MSGPI	NM 2010 Agu Chronic 80 mg	Copper, dissolved	c	Mon	4/22/2019	-0-	1	1	2"	27	7	V

Not-detected - discontinue monitoring
WQS Exceedance - violation and corrective action





#### **Effluent Limitation Guidelines**

#### Sector D – Asphalt Batch Plant

Analyte	Field Prep Code	Daily Min	Daily Max	30-Day Avg	Units
Oil and Grease	UF		15	10	mg/L
рН	UF	6	9		SU
TSS	UF		23	15	mg/L

- Any exceedance is a permit violation and triggers the corrective action process;
  - A follow-up sample must be collected within 30 days or during the next qualifying storm event.
- If follow-up result also exceeds, submit an ELG Exceedance Report to EPA and monitoring moves from annual to quarterly until results return to compliance.





#### **Exceedances-ELG**

#### 2019 Triad permit data

	MSGP Station Number	Level Type			Last Mon	Actual Result Average	Report Units	Analysis Results Count	Results	Adjusted	Maximum Adjusted Result	MSGP ELG Exceedar ce	MSGP ELG Daily Min Level				Day Avg Sequence	ELG 30- Day Avg	MSGP ELG 30- Day Avg Adjusted Result	MSGP 30- Day Avg Adjusted Result > ELG
TA-60 Asphalt Batch Plant		MSGP ELG Daily Max, MSGP ELG 30- Day Avg		UF	07/25/2019	1.41	mg/L	1	0	0.0	0.0	) N			15.0	N	1	10.0	0.0	o N
TA-60 Asphalt Batch Plant		MSGP ELG Daily Max, MSGP ELG 30-	Total Suspended Solids (TSS)	UF	07/25/2019		)mg/L	1	1	141.0	141.0	) Y			23.0		1	15.0	141.0	) Y
TA-60 Asphalt Batch Plant		MSGP ELG Daily Max, MSGP ELG 30- Day Avg	Total Suspended Solids (TSS)	UF	08/07/2019	101.0	mg/L	2	2	61.0	141.0	) Y			23.0	Y	2	15.0	101.0	) Y
TA-60 Asphalt Batch Plant		MSGP ELG Daily Max, MSGP ELG Daily Min	рН	UF	08/07/2019	9.03	SU	2	0	8.93	9.13	Y	6.0	N	9.0	Y				

#### TSS and pH - 2 exceedances in 2019

- Submitted Exceedance Report to EPA
- Now monitoring quarterly until results return to compliance

Every TSS result at Asphalt Batch Plant since 2011 has exceeded the ELG





#### Summary

- Consistent pattern of repeated exceedances for the same parameters at most locations
- Need to evaluate the appropriateness and effectiveness of corrective actions
- New AIM Tiered Corrective Action process requires increasingly more prescriptive and robust responses
  - Tier 1 Review existing controls, add new controls, continue monitoring (same as current requirement)
  - Tier 2 Implement Sector-specific stormwater controls
  - Tier 3 Install permanent controls
- LANL's environmental compliance data are published on EPA's Enforcement and Compliance History Online (ECHO) public website. Environmental groups and stakeholders review and assess facility data nationwide to advocate for more stringent permit conditions.





DAviel M., abeft 12-21-20

Daviel M., abeft 12-21-20

Mary Medina 137563

Gary Medina 12-21-20

Arturo Arellano adono alluo
188082 12-21-20

Tozzes Marfinez 12-21-20

340565 felle

Jozzes Markinez 12-21-20 340565 Mills Danny Esquibe 146331 12-21-20



#### **MSGP** Routine Facility Inspections



# When Do I Perform A Routine Facility Inspection (RFI)?

- At least <u>quarterly</u>
  - Monthly for areas w/ significant activities and materials exposed to stormwater
- At least <u>once a calendar year</u> during stormwater discharge
- Once a calendar year for sites in No Exposure or Inactive status





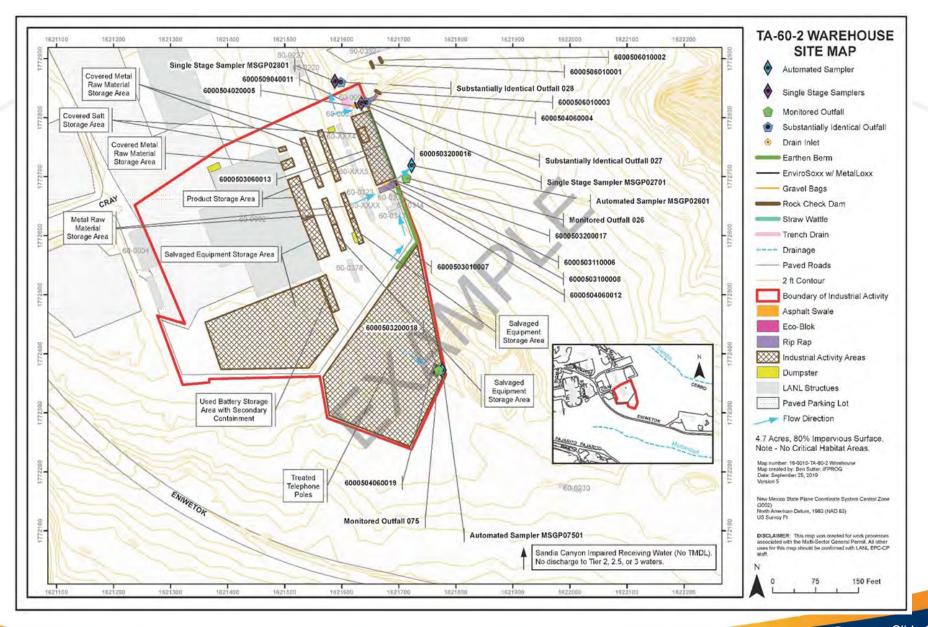
## Where Do I Find Information to Help Me Perform an RFI?



Psst! Look at the SWPPP









#### What Does An RFI Cover?

Weather at time of inspection

- \*
- Discharges or evidence of discharges from the site
  - New discharges?
  - Evidence of, or potential for pollutants to enter the drainage system?



- Monitored outfalls and Substantially Identical Outfalls (SIOs)
  - Evidence of erosion?
  - Evidence of pollutants in discharge?
  - Flow dissipation devices operating effectively?







#### What Does An RFI Cover?

- Stormwater Control Measures
  - Are they operating effectively?
  - Are then in need of maintenance, repair, replacement?











#### What Does An RFI Cover?

- Industrial areas/activities exposed to stormwater
  - Includes the site's MSGP Sector of Industrial Activity (e.g. TA-60-2
     Warehouse is under Sector P: Land Transportation and Warehousing)
- Additional activities you must inspect for
  - Dust generation
  - Offsite tracking
  - Housekeeping
  - Leaks/spills
- Non-compliances not identified in the above sections
- Additional Control Measures
- Signed Certification Statement





## **Common Issues Found During**

Inspection















#### Los Alamos National Laboratory

#### Work Order MSGP-RI-64155

MSGP Routine Inspection Printed 3/2/2020 - 11:02 AM

Vlainten	ance Details					rinted :	3/2/2020	- 11:02
	ed: 2/28/2020 12:04:29 PM	Target:	3/31/2020	_I MSGP	Program			
	re: MSGP Routine Facility Inspection (EPC-CP-Form- 1020.2)	Priority/Type: Department:	Normal / Inspection Utilities and Infrastructure	# RG12		use		
Last PM	1/23/2020			To be to select				
Project:	Routine Facility Inspections March 2020 (P-MSGP-RI- 5427)			Phone:				
Reason:	2020 March Inspections							
Tasks —								
asns								
#	Description			4	Meas.	No	N/A	Yes
	rinformation			1				
20	Describe the weather at time of in	repection and doc	ument the temperature (F').	15				
Within t	he Facility Boundary			700				
2	Is the facility free of new discharg	ges of pollutants th	nat have occurred since the la	ast		2		42
40	inspection? If "Falled" describe:	Partier at was tak		1			100	
50	If "No" has a CAR been previou				_	- D		- E
60	is the facility free of discharge of							
70	Is the facility free of evidence of, system. If "No" describe.	or the potential for	r, pollutants entering the drain	nage		П	D	П.
	nspection (identify needed main		pairs, failed control measur	es that need	replacem	ent, or	a desc	ription
	ctive actions in relevant task co	A STORY OF THE PARTY OF THE PAR	and the second			1		1
90	Monitored Outfall [026] Free of			waste Carlotte				
100	Monitored Outfall [026] Flow Di					-11	113	
110	Monitored Outfall [026] Free of Water? If "No", describe.	Evidence of Hollu	tants in Discharges and/or K	eceiving		. [7]		
Vol	Monitored Outfall [026] Free of	any unauthorized	non-stormwater discharges?	If "No"		100	1/2	
120	describe.			_				
130	Monitored Outfall [075] Free of					II.		
140	Monitored Outfall [075] Flow Di				_		124	
150	Monitored Outfall [075] Free of Water? If "No", describe.	Evidence of Pollu	tants in Discharges and/or R	eceiving		n	П	_
160	Monitored Outfall [075] Free of describe.	any unauthorized	non-stormwater discharges?	If "No"		П		Е
170	Substantially Identical Outfall [	027] Free of Evid	ence of Erosion? If "No", des	cribe.			I.	D
180	Substantially Identical Outfall [ "No", describe.	027] Flow Dissipa	ation Devices Operating Effect	ctively? If		П	П	
190	Substantially Identical Outfall [ Receiving Water? If "No", describ		ence of Pollutants in Dischar	ges and/or		П	П	
200	Substantially Identical Outfall [ discharges? If "No" describe.		unauthorized non-stormwate			F	-	-
210	Substantially Identical Outfall [	0281 Free of Fuid	ance of Einsland (f "Na" Was	crihe		-		-
220	Substantially Identical Outfall [ "No" describe					Б		F
440	THO WOODING	00000		-		1.3	Lillian	-

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 [028] Free of any unauthorized non-stormwater

- This is an example of a printed inspection form.
- Forms may be completed electronically through software MC Express.
- Instructions for performing inspection and filling out form are in procedure EPC-CP-QP-023, MSGP Routine Facility Inspections



Receiving Water? If "No", describe

260	Gravel Bags [6000503100008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	D		П
270	Concrete/Asphalt Channel/Swale [6000504020005] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	П	П	П
280	Eco-Block [6000503110006] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		П	
10.5	Rin Ran (6000504060004) Control Measure is operating effectively? If "No" describe			
290	condition & need for Maintenance, Repair. If you need more space, Write	П		
300	Rip Rap [6000504060012] Control Measu "See Labor Report" and condition & need for Maintenance, Repair,	П	П	
310	Rip Rap [6000504060019] Control Measu Continue notes at end of form condition & need for Maintenance, Repair, or Replacement.	П	17	E
ánn	Earthen Berm [6000503010007] Control Measure is operating effectively? If "No" describe	1	-	-
320	condition & need for Maintenance, Repair, or Replacement.  Straw Wattle [6000503060013] Control Measure is operating effectively? If "No" describe	1.1	-44	-
330	condition & need for Maintenance, Repair, or Replacement. Elk ate wattle. Need to replace.	X	П	
340	Rock Check Dam [6000506010001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	П		
350	Rock Check Dam [6000506010002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	п		П
	Rock Check Dam [6000506010003] Control Measure is operating effectively? If "No"	13.		
360	describe condition & need for Maintenance, Repair, or Replacement.  Trench Drain [6000509040011] Control Measure is operating effectively? If "Not" describe	D		
370	condition & need for Maintenance, Repair, or Replacement.			D
380	EnviroSoxx w/ MetalLoxx [6000503200016] Control Measure is operating effectively? If  "No" describe condition & need for Maintenance, Repair, or Replacement.		D	D-
390	EnviroSoxx w/ MetalLoxx [6000503200017] Control Measure is ope If your site does not have "No" describe condition & need for Maintenance, Repair, or Replaced an activity, check N/A		D	D
400	EnviroSoxx w/ MetalLoxx [6000503200018] Control Measure is operating encourage in "No" describe condition & need for Maintenance, Repair, or Replacement		п	
420	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	-	7	
			_X_	
430	Transfer areas for substances in bulk controls adequate (appropriate, effective, and		<u>X</u>	
430 440	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe  Product/chemical storage areas (raw material): controls adequate (appropriate, effective,	п		
440	Transfer areas for substances in bulk' controls adequate (appropriate, effective, and operating)? If "No" describe  Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.  Liquid tank storage/secondary containment, controls adequate (appropriate, effective, and			正
440 450	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe  Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.  Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.  Industrial processing and finished product storage areas: controls adequate (appropriate,			正
440 450	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe  Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.  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:			正
440 450 460	Transfer areas for substances in bulk' controls adequate (appropriate, effective, and operating)? If "No" describe  Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.  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.			正
440 450 460	Transfer areas for substances in bulk' controls adequate (appropriate, effective, and operating)? If "No" describe  Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.  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.			正
440 450 460 470 480	Transfer areas for substances in bulk' controls adequate (appropriate, effective, and operating)? If "No" describe.  Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.  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,			正
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#### What Do I Do When I Complete the RFI?

- Check your work (especially the check boxes)
- Sign it.....and date/time it
- Sign the Certification Statement (w/in 14 days of inspection)
- Add it to your SWPPP
- Enter any issues\* (corrective actions) into the Corrective Action Response database

\*Anyone can identify potential stormwater issue, not just DEPs or MSGP Program staff













#### Call the MSGP Program Team when you have questions









#### **MSGP Corrective Actions**



### **Agenda**

- Definition of corrective action
- Conditions requiring corrective action
- Immediate corrective action
- Subsequent corrective action
- 45-day extension
- Corrective action documentation





#### **Corrective Action**

Definition: Any action taken, or required to be taken, to

- (1) repair, modify, or replace any stormwater control used at the site;
- (2) clean up and dispose of spills, releases, or other deposits found on the site;
- (3) satisfy any permit condition or SWPPP requirement





## **Conditions Requiring Corrective Action**

- Unauthorized release or discharge
- Impaired water quality standards are exceeded (e.g., control measures are inadequately managing stormwater discharges)
- The average of four quarterly sampling results exceeds an applicable benchmark
- Effluent limitation guidelines are exceeded at the Asphalt Batch Plant (Sector D)
- Control measures are not being properly operated and maintained





# Conditions Requiring Corrective Action (cont.)

- Visual assessment that shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam)
- A regulator during an inspection determines control modification is necessary to meet non-numeric effluent limits
- Facility operations change resulting in an increase in the quantities of pollutants discharged
- Failure to meet any permit condition or those specified in the site specific SWPPP





## **Conditions Requiring Corrective Action**















## **Conditions Requiring Corrective Action**













#### **Immediate Corrective Action**

- Shall *Immediately* act upon identification of an issue
  - Immediately is the same day a condition is found
  - Solely calling or emailing personnel requesting action is not considered to be an immediate response
  - Minimize or prevent the discharge of pollutants until a permanent solution is installed (e.g., absorbents, micro blaze, gravel bags)





### **Immediate Corrective Action (cont.)**

- Clean up all contaminated surfaces to prevent pollutant discharge during subsequent storm events
- Designated staff must be trained and available to provide immediate support
- Basic BMPs and cleanup materials must be readily available on site
- If found after 3:00 pm, action must be taken the next workday





#### **Subsequent Corrective Action**

- For minor conditions, immediate action is often sufficient, and no additional action is necessary
- An FSR may be required to initiate a follow up action or permanent solution after the immediate action is completed (e.g., procurement and installation of a new stormwater control measure or SCM)
- Complete the corrective action (e.g., install a new or modified control and make it operational or complete the repair) <u>before the next</u> <u>storm event or within 14 calendar days from the time of discovery</u>
- Any corrective action resulting in a change to a SCM or procedure documented in the SWPPP will require SWPPP modification within 14 days of completing the corrective action





### **Subsequent Corrective Action (cont.)**

- If finalization of CA is *infeasible* within the 14-day timeline then:
  - Document reasoning in database (e.g., delays in procuring industrial stormwater controls, installation of enclosures, etc.)
  - Provide a schedule for completion of corrective action in database
  - If the completion of a corrective action is anticipated to take more than 45 days from the time of discovery, EPA must be provided a notification of the intention to exceed, rational for the extension and a completion date
  - These time intervals are not grace periods, but are schedules for documenting findings and for making repairs and improvements
  - The permit does not allow corrective actions to remain open indefinitely





### 45 Day Extension

- If a CA is expected to exceed the 45-day timeframe the DEP shall provide EPC-CP the following information:
  - Rationale for an extension (e.g. an engineered design and installation of an engineered control)
  - A description of the condition requiring corrective action along with a summary of the preliminary steps that have been taken to complete the corrective action
  - A realistic completion date along with a realistic and detailed schedule that includes all outstanding steps required to complete the corrective action
- EPC-CP MSGP staff will prepare and submit to EPA the 45day exceedance based on the information above





#### **Corrective Action Documentation Recap**

- Within 24 hours of discovery enter a description of the condition requiring corrective action and the date the condition was identified in the CAR database
- Document immediate actions taken to minimize or prevent the discharge of pollutants
- Document dates when each corrective action was initiated, completed, or is expected to be completed
- If the corrective action cannot be completed within 14-days, provide a schedule and justification why it is infeasible to complete the necessary installation





# Corrective Action Documentation Recap (cont.)

- Spill documentation must describe:
  - Material, location, amount, date/time and the cause of the spill
  - Leaks, spills, or other releases that resulted in discharges of pollutants to waters of the U.S
  - Response actions, date/time cleanup was completed, notifications, staff involved, measures implemented to prevent reoccurrence





# Additional Implementation Measures (AIM)

- EPA proposed revisions to the 2015 MSGP's provisions regarding benchmark monitoring exceedances
- There are three AIM levels: AIM Tier 1, Tier 2, and Tier 3
- Operators will be required to respond to different AIM levels with increasingly robust control measures depending on the nature and magnitude of the benchmark threshold exceedance







## New Mexico Water Quality Control Commission Compliance

Spills and Unplanned Releases Legacy Equipment – Lesson's Learned



### **Presentation Overview**

- Environmental Reporting Requirements
- Who to Contact in the Event of a Release
- Ways to Prevent Spills
- NPDES MSGP Requirements
- Legacy Equipment Lessons Learned
- Questions





## Spills- Unplanned Releases to the Environment

- Water Quality investigates and evaluates spills throughout LANL to determine if external reporting is required to comply with State and Federal Regulations
  - NMWQCC Regulations, Clean Water Act, CERCLA, EPCRA





## **Spills- Unplanned Releases to the Environment**

- Corrective actions need to be taken for all spills that occur
- There is not a de minimis volume of spilled material that does not need to be addressed







## Who to Contact in the Event of a Spill

- Notify Supervisor of Spill Occurrence
- Notify the Roads and Grounds Deployed Environmental Professional
  - Leonard Sandoval
- Notify Water Quality Spills Pager 664-7722
- Notify Emergency Operations in the event of an emergency 667-6211







## **Spill Prevention and Minimization**

- Plan work to eliminate avoidable spills
- Use secondary containment to prevent releases to the environment
- Ensure preventive maintenance on equipment is completed
- Know where spill kits are located and how to use contents
- Know who to contact in the event of a release





Slide 6



## NPDES Multi-Sector General Permit (MSGP) Requirements

- Drain fluids from equipment and vehicles that will be decommissioned, and, for any equipment and vehicles that will remain unused for extended periods of time, inspect at least monthly for leaks.
  - At LANL-"an extended period of time" is considered to be 6 months.







## Legacy Equipment Sheep's Foot Compactor-Lesson's Learned

- Compactor discovered on Sigma Mesa-slated to be salvaged
- Diesel was identified to be leaking from equipment
- Initially thought to be empty
  - Actually filled with over 900 gallons of diesel/water







# Legacy Equipment Sheep's Foot Compactor-Lesson's Learned Continued

- Diesel filled compactor presented significant environmental compliance and safety concern
  - SPCC, NMWQCC, Site Safety
- Notify your management and environmental resources to investigate any unknown equipment or equipment suspected to contain potential water contaminants to mitigate safety and environmental issues







## **Questions?**







Roads & Grounds Safety Meeting SWPP Traming

Facilitator: Dana Parrett, Brian I Cona Leonard San Meeting Date: Monday, October 29, 2018

Place/Room: TA-60 Bldg 250

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Roads & Grounds Safety Meeting SUPPP Training

Meeting Date: Monday, October 29, 2018

Facilitator: Dana Parrett, Bran Icona Leonard Sandoval

Place/Room: TA-60 Bldg 250

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Facilitator: Dana Parrett, Brian I Cona Place/Room: TA-60 Bldg 250
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Meeting Date: Monday, October 29, 2018

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## Meeting Sign-In Sheet Roads & Grounds Safety Meeting Meeting Date: Monday, October 29, 2018 Facilitator: Dana Parrett Place/Room: TA-60 Bldg 250

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#### ATTACHMENT 12: MSGP (OR ACTIVE URL)

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

## ATTACHMENT 13: THREATENED AND ENDANGERED SPECIES HABITAT MANAGEMENT PLAN FOR LOS ALAMOS NATIONAL LABORATORY

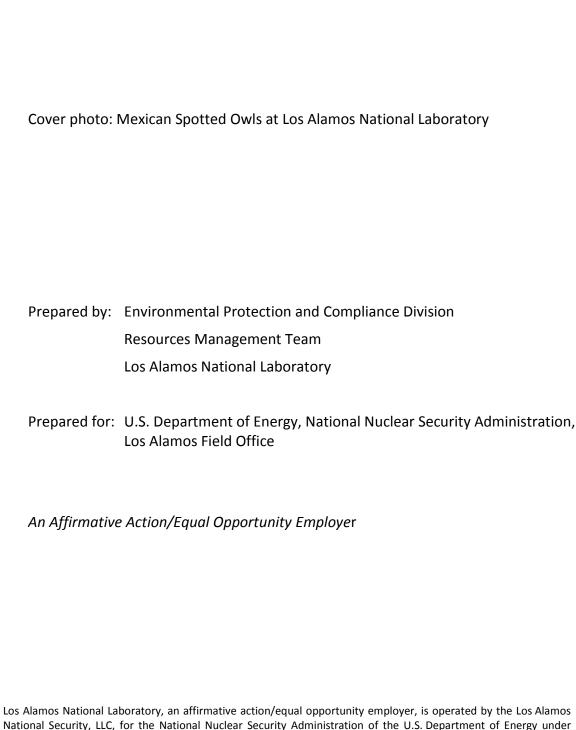
Approved for public release; distribution is unlimited.

October2017

# Threatened and Endangered Species Habitat Management Plan for Los Alamos National Laboratory







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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.

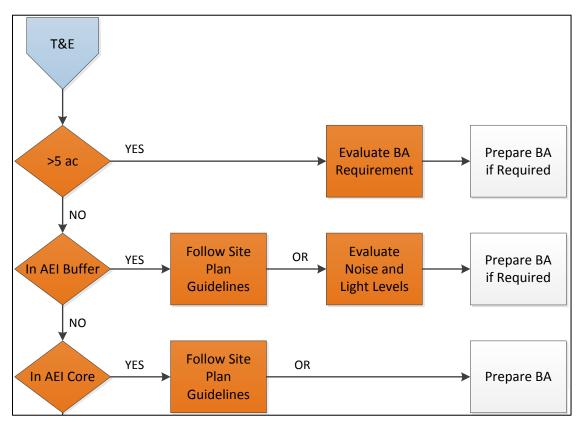


Figure 1. Process flowchart for determining site plan requirements

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 × 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 (<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. 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						
	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						
	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	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 (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 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 Restrictions					
	Medium	May 15 to August 15 May 15 to Aug					
	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

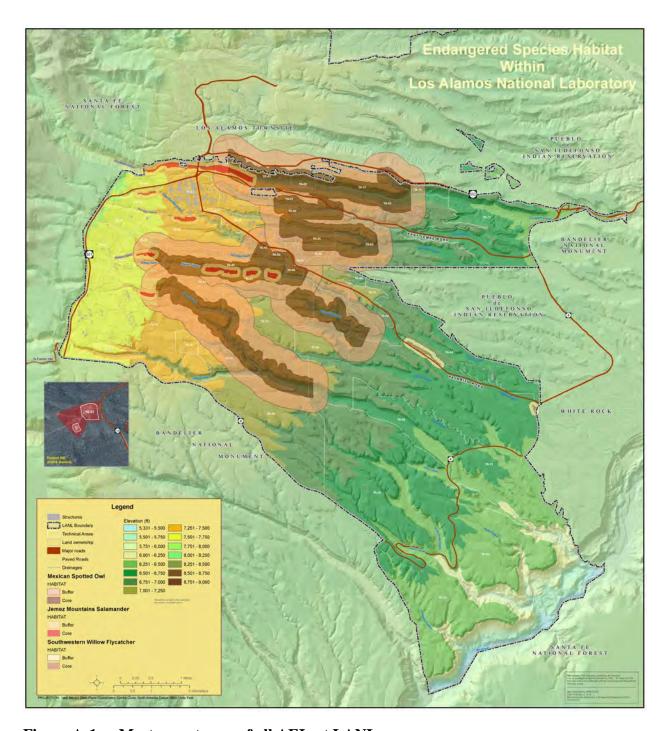


Figure A-1. Most recent map of all AEIs at LANL

## 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

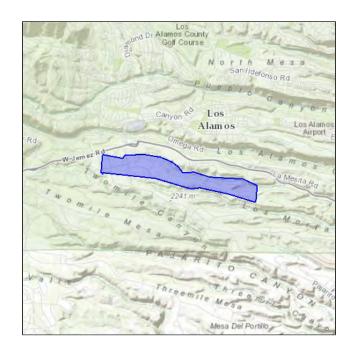
LXATM-TI5EJ-BAJEQ-3NC5E-SOGYTE

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 Section 7 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

Bird of conservation concern

Season: Breeding

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B070

Williamson's Sapsucker Sphyrapicus thyroideus

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 <u>National Wildlife Refuge</u> 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: ENV-CP-QAPP-MSGP

The EPC-CP Quality Assurance Project Plan is in the process of being replaced by EPC-CP-PIP-2101, NPDES Multi-Sector General Permit. The current document, ENV-CP-QAPP-MSGP R5, 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			
Deriv	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	Organization:	Signature:	Date:		
Manager:	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
	Effective Date: 11/04/2013	

## **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

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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.
	1

#### 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 Environmental Professionals (DEPs)	Assure SWPPP implementation as required by MSGP.
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
	рН	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	Review analytical data with Project Lead and provide input into a possible corrective action necessary to improve water quality where needed.     Evaluate and improve BMPs in accordance with site conditions, industry standards, and manufacturer

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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	Provide input to the design process in accordance with appropriate standards, requirements, and implementing procedures.
	<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* 

The following table lists responsibilities:

Corrective Action Management.

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.		
	<ul> <li>Provide input to the QA Specialist as to the content of audit.</li> </ul>		
	<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

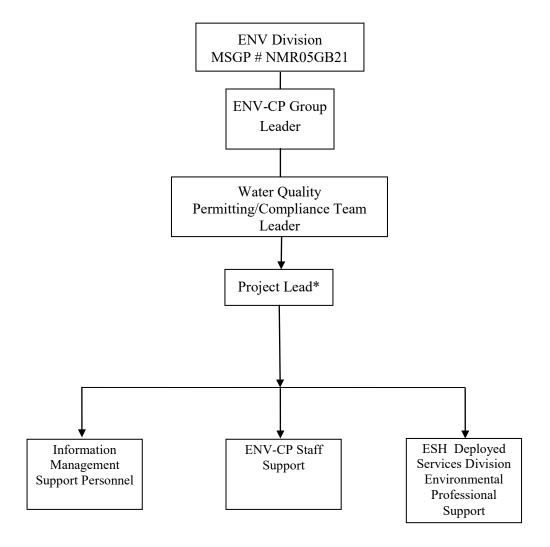
Attachment 6 – Analytes by Industrial Sector

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:
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 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.2 or B.3 below where poliutants may be exposed to stormwater.
2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? YES NO  If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

	NPDES Permit Tracking No
Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP?	YES NO
If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any	y control measures în 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 dissipation measures to prevent scouring:	nd outfalls, including flow
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 sul authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result inspection?  YES NO	bmission (or since you received t of this 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 a tormwater inspection.	as a result of this comprehensive

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C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS		
Complete one block for each industrial activity area where pollutants ma	y be expose	ed to stormwater. Copy this page for additional industrial activity areas
In reviewing each area, you should consider:  Industrial materials, residue, or trash that may have or could come  Leaks or spills from industrial equipment, drums, tanks, and other:  Offsite tracking of industrial or waste materials from areas of no ex  Tracking or blowing of raw, final, or waste materials from areas of	into contact containers; posure to ex	with stormwater; posed areas; and
INDUSTRIAL ACTIVITY AREA:		
1. Brief Description:		
2. Are any control measures in need of maintenance or repair?	☐ YES	□ NO
Have any control measures failed and require replacement?	☐ YES	□NO
4. 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 probler Corrective Action Form)	ii. (Ally neo	assary corrective actions should be described on the attached
NDUSTRIAL ACTIVITY AREA:  1. Brief Description:		
	YES	□ NO
2. Are any control measures in need of maintenance or repair?	□ YES	□ NO
Brief Description:		
1. Brief Description:  2. Are any control measures in need of maintenance or repair?  3. Have any control measures failed and require replacement?	☐ YES	□ NO
2. Are any control measures in need of maintenance or repair? 3. Have any control measures failed and require replacement? 4. Are any additional/revised c necessary in this area?  If YES to any of these three questions, provide a description of the probler Corrective Action Form)	☐ YES	□ NO
2. Are any control measures in need of maintenance or repair? 3. Have any control measures failed and require replacement? 4. Are any additional/revised c necessary in this area?  If YES to any of these three questions, provide a description of the probler Corrective Action Form)	☐ YES	□ NO
2. Are any control measures in need of maintenance or repair? 3. Have any control measures failed and require replacement? 4. Are any additional/revised c necessary in this area?  If YES to any of these three questions, provide a description of the probler Corrective Action Form)  NDUSTRIAL ACTIVITY AREA:	☐ YES	□ NO
Brief Description:  Are any control measures in need of maintenance or repair?  Have any control measures failed and require replacement?  Are any additional/revised c necessary in this area?  If YES to any of these three questions, provide a description of the problem Corrective Action Form)	☐ YES☐ YES☐: (Any nec	□ NO □ NO essary corrective actions should be described on the attached
2. Are any control measures in need of maintenance or repair? 3. Have any control measures failed and require replacement? 4. Are any additional/revised c necessary in this area?  If YES to any of these three questions, provide a description of the probler Corrective Action Form)	☐ YES ☐ YES m: (Any nec	□ NO □ NO essary corrective actions should be described on the attached

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NPDES Permit Tracking No.:

		NOTE: Copy this page and attach additional pages as neces
INDUSTRIAL ACTIVITY AREA		
1. 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
	f the problem:	(Any necessary corrective actions should be described on the attached
INDUSTRIAL ACTIVITY APPA		
INDUSTRIAL ACTIVITY AREA		
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 Corrective Action Form)	f the problem:	(Any necessary corrective actions should be described on the attached
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?	☐ YES	□ NO
4. Are any additional/revised BMPs necessary in this area?	YES	NO
Corrective Action Form)	the problem:	(Any necessary corrective actions should be described on the attached

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	NPDES Permit Tracking No
D. CORRECTIVE ACTIONS	
D. CORRECTIVE ACTIONS  Complete this page for each englific condition requiring a personting action as a review determining that are access.	
Complete this page for each specific condition requiring a corrective action or a review determining that no corre page for additional corrective actions or reviews.	ctive action is needed. Copy this
Include both corrective actions that have been initiated or completed since the last annual report, and future corrective acti identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had report.	ions needed to address problems not been completed at the time of your
1. Corrective Action #	
2. Is this corrective action:	
☐ An update on a corrective action from a previous annual report; or	
☐ A new corrective action?	
d. 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	9
☐ Change in facility operations necessitated change in control measures	
Average benchmark value exceedance	
Other (describe):	
Briefly describe the nature of the problem identified:	
5. Date problem identified:	
. 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 modifications are needed, basis for that determination:	ifications or repairs to control
B. Did/will this corrective action require modification of your SWPPP? ☐ YES ☐ NO	
Date corrective action initiated:// / / /	1111
u. Date correction action completed:/ completed://	
11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection (including timeframes associated with each step) necessary to complete corrective action:	ction and describe any remaining steps

	NPDES 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 p your knowledge, you are in compliance with the permit?   YES   NO	ermit, and that, based upon the results of this 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 assure that qualified personnel properly gathered and evaluated the information submitted system, or those persons directly responsible for gathering the information, the information and complete. I am aware that there are significant penalties for submitting false informativitations.	Based on my inquiry of the person or persons who manage the submitted is, to the best of my knowledge and belief, true, accurate,
Authorized Representative Printed Name:	Title:
Signature:	Date Signed:

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## ATTACHMENT 3 – ROUTINE INSPECTION FORM

Name of Facility:				Resnons	ible FOD (Name & Organizatio	n)·
<u>=</u>	· · · · · · · · · · · · · · · · · · ·			•		
Qualified Inspector(s):			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	before the ne	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     E. Waste Handling & disposal areas     F. Erodible areas / construction     G. Non-storm water / illicit connections						

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Н.	Salt storage piles or pile containing salt					
I.	Dust generation & vehicle tracking					
Are	<u> </u>	chedules and procedures bei	eing implemented at the facility? □ Yes □ No			
We	ere any Corrective Actions initia	ed or completed?   Yes   No	o Describe:			
Are	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)					
		e Action in the MSGP Correct	ctive Action Report database for each listed)			
		e Action in the MSGP Correct	ctive 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			Сорреі
				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)
				рН	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-2108, MSGP ROUTINE FACILITY INSPECTIONS

EPC-CP-QP-2108	Revision: <b>0</b>	Los Alamos
Effective Date: 07/09/2020	Next Review Date: 07/09/2023	NATIONAL LABORATORY EST. 1943

# Environment, Safety, Health, Quality, Safeguards, and Security Directorate Environment Protection and Compliance – Compliance Programs Group Quality Procedure

# **MSGP Routine Facility Inspections**

Hazard Grading:	⊠ Low	Moderate	High/Complex	
Usage Level:	□ Reference	UET	Mixed: UET Sections:	
Status:	New	Major Revision	Minor Revision	
	Review w/No	Changes	Other: New EPC-CP format & numbering	system
Safety Basis:	⊠ N/A	USQ	USI Number:	
	l	Document Author	/Subject Matter Expert:	
Name:		Organization:	Signature:	Date:
Holly L. Wheeler		EPC-CP	Signature on File	07-08-20
	Derivativ	e Classifier: 🛛 L	Jnclassified or	
Name:		Organization:	Signature:	Date:
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Terrill W. Lemke, Te	am Leader	EPC-CP	Signature on File	07-08-20
EPC-CP RLM:		Organization:	Signature:	Date:
Taunia Van Valkenb	urg, Group Leader	EPC-CP	Signature on File	07-09-20

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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]
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.
EPC-CP-QP-2108, R0	07/09/2020	Supersedes EPC-CP-QP-023 R1. Reformat to new EPC-CP template, re-number procedure and forms to new EPC-CP procedure numbering system, and other edits.

# MSGP Routine Facility Inspections

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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

Part 3.1 of the MSGP contains specific requirements for conducting and documenting periodic industrial routine facility inspections. This procedure governs the activities of 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 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 other LANL staff 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 this procedure 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 Forms (e.g., add or remove Best Management Practices (BMPs));
- Training personnel to use MC Express;
- Performing a quality review of routine facility inspections and "no exposure" site inspections; and
- Assisting customers with issues associated with MC Express.

#### 2.2 Deployed Environmental Professionals

DEPs are responsible for the following:

- Implementing this procedure;
- 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-PIP-2101, NPDES *Multi-Sector General Permit Program Implementation Plan*;
- Being trained on EPC-CP-QP-022, MSGP Corrective Actions;
- Being trained to 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 throughout the year at regulated sites within their FOD (depending on inspection frequency identified in site-specific 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 works with the EPC-CP Group Leader to ensure 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 and MSGP Routine Facility 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.

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#### 3.0 PRECAUTIONS AND LIMITATIONS

#### 3.1 Precautions

The hazard rating for the activities described in this procedure is **LOW** and therefore, does not require an Integrated Work Document (IWD).

Personnel must wear appropriate clothing (e.g., boots, long pants, etc.) to perform work in the field.

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).

If conditions prevent fieldwork, document the conditions on the work order. Multiple attempts can be documented on the original form. If the target date cannot be met, the field personnel must contact the Program Lead no less than 24 hours before the target date for guidance.

#### 3.2 Limitations

In MC Express, document responses to each question on a work order by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes." When using a hard copy form, mark the appropriate "Yes" or "No" check box.

Throughout this process, the field personnel will document comments and notations in the "Comments" field of the associated task line. If field personnel need more space, additional comments can be entered in the "Labor Report Update" field (see Section 5.2) when the work order is updated to "Complete" status. When using a hard copy form, document comments on the corresponding task line. If additional space is needed, comments can be entered in the "Labor Report" section at the bottom of the form.

Some terminology varies between the MC Express software and the Maintenance Connection (MC) desktop software.

- The "Reading" field in MC Express is the same field as "Reading Final" in MC 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. MC desktop and hard copy (printed) work orders use "Yes" and "No" terminology.

Click the "Save" bar after all entries for a task line question have been completed and before proceeding to the next task line question. Failure to "Save" results in lost data entries.

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#### 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.
- 2. 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. Gather the necessary equipment (see Section 4.2) for the work to be done.
- 4. Using the Safari or Chrome web browser on a tablet or notebook style computer, log into the MC Express application (http://express.maintenanceconnection.com) and confirm that the work order list displayed matches your sites. If the work order lists do not match, contact EPC-CP Data Management personnel for clarification.
- 5. 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.
- 6. Click on the "Tasks" bar to navigate to the work order Tasks page. See MC Express screen shot examples in Attachment 1.
- 7. Always log out of MC Express when you have finished work OR if work is interrupted.

#### 4.2 Special Tools, Equipment, Parts, and Supplies

Ensure the following equipment is available.

- Sturdy hiking boots or steel-toed shoes with soles that grip.
- Facility-specific PPE as required by IWD Part II.
- 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-QP-2108 R0 Form 1, *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.

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#### 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. Results of visual and analytical monitoring for the past year must be considered when planning and conducting an inspection. The inspections are performed on the following facility areas:

- 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 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

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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.

#### 5.1 Conducting the Inspection

See Attachment 1 for screen shot examples of EPC-CP-QP-2108 R0 Form 1, MSGP Routine Facility Inspection in MC Express. See Attachment 2 for an example of the inspection form in hard copy format. Questions will be answered "Yes/Complete" or "No/Failed" unless the instructions specify "N/A" may also be used.

**NOTE:** Each item number listed in red font below corresponds to a red numbered box on both screenshots and hard copy format.

- [1] **ITEM 1**: Observe the weather at time of inspection. Document the weather and temperature in the "Comments" field of the task line (e.g., Temp. 78°F, sunny, wind less than 5mph).
- [2] ITEM 2: Observe and document the facility is free of **previously** unidentified discharges from and/or pollutants that have occurred **since the last inspection**. Describe any new discharges and the specific location in the "Comments" field of the task line.
- [3] **ITEM 3**:

IF the response to ITEM 2 is "Yes",

THEN answer this task line as "N/A".

OR

IF the response to ITEM 2 is "No",

<u>THEN</u> answer this task line as "Yes" and document the corrective action previously initiated for the discharge.

- [4] ITEM 4: Check the facility is free of discharges of pollutants at the time of inspection. Describe any pollutant discharge and the specific location in the "Comments" field of the task line.
- [5] ITEM 5: Check the facility is free of evidence of pollutants entering the drainage system OR the potential for pollutants entering the drainage system. Describe any discharge or potential discharge and the specific location in the "Comments" field of the task line.
- [6] ITEM 6: Check the outfall does not have any **new** evidence of erosion **since the last inspection**. Describe any erosion observed in the "Comments" field of the task line.

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- [7] ITEM 7: Check all flow dissipation devices are operating effectively and are not in need of repair. Describe any non-functional status of devices in the "Comments" field of the task line (e.g., repair berm, replace rip rap, etc.).
- [8] ITEM 8: Check the outfall is free of evidence of pollutants in the discharge and/or the receiving water. Describe any pollutants observed in the "Comments" field of the task line (e.g., sediment from nearby erosion, etc.).
- [9] ITEM 9: Check the outfall is free of unauthorized non-stormwater discharges.

  Describe any unauthorized discharges observed in the "Comments" field of the task line (e.g., street sweeper emptied contents at Outfall 001, etc.).
- [10] Repeat Steps 6 through 9 for each outfall shown on the work order, if the location has more than one outfall.
- [11] **ITEM 10**: Check each control measure is operating effectively. 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.
  - [a] Determine if additional controls are necessary, or that existing controls are insufficient and require replacement with a different type of control.
  - [b] The DEPs are responsible for the selection and oversight of proper installation of appropriate control measures per guidance provided in the LANL Stormwater BMP Manual.
- [12] Repeat Step 11 for each control measure shown on the work order, if the location has more than one control measure.
- [13] **ITEM 11**: Check each sector of NPDES specified industrial area/activity is inspected for exposure to stormwater (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).
  - [a] Determine if the control measures associated with each industrial area/activity are appropriate for the activity, effectively controlling stormwater exposure, and operating.
  - [b] 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.
  - [c] For industrial activities that do not occur at the facility, select "N/A" on that task line.
- [14] Repeat Step 13 for each industrial area/activity shown on the work order, if the facility has more than one sector of NPDES specified industrial area/activity.

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- [15] ITEM 12: Check the facility is free of any incidence of non-compliance not documented elsewhere on the inspection form. Describe any additional incidences of non-compliance in the "Comments" field of the task line.
- [16] ITEM 13: Check the facility meets the MSGP requirements with existing control measures. Describe any additional control measures needed to comply with the Permit.
- [17] After all task lines have been completed, make sure you have clicked the "Save" bar at the bottom of the page.

#### 5.2 Completing the Inspection Form

See Attachment 1 for completing EPC-CP-QP-2108 R0 Form 1 in MC Express and Attachment 2 for a hard copy example.

- [1] Ensure the inspection form has been filled out completely.
- [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 to open the Work Order Status Update page. MC Express auto-populates the date and time fields.

#### **CAUTION**

MC Express automatically changes the work order status to "Closed."

- [4] 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.
  - [a] Ensure the date and time that is auto-populated are the date and time that the work was completed and not the date/time the form was filled out.
  - [b] <u>IF</u> work needs to be performed over multiple days, <u>THEN</u> note the date and time the work began in the Labor Report field.
  - [c] To update the date or time, click the "Date" field and make necessary adjustments using the available timestamp application. Click "Set" to apply changes.
  - [d] <u>IF</u> using a hard copy form, <u>THEN</u> write the date and time the work was completed.
- [5] **ITEM 15**: The field personnel must type or write his/her name in the "Labor Report Update" field.
- [6] Additional notes, observations, or site conditions not documented in a task line "Comments" field can be documented in the "Labor Report Update" field.

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- [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.
  - [a] ITEM 16: Capture an electronic signature by drawing with a finger on the tablet screen.
    - **NOTE:** The mouse must be used to sign electronically when using MC Express on a desktop screen (not a tablet).
  - [b] If using a hard copy form, the field personnel will sign his/her name and write in the date of when the form was signed.
  - [c] By electronically signing the work order, field personnel certifies that the information submitted is "true, accurate, and complete."
- [8] Click on the "Save" bar at the bottom of the page to close the "Signature" field.

#### 5.3 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.

- [1] Using the Chrome 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.
  - [a] Enter the work order number in the "Search Value" field.
  - [b] 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" sub-tab.
- [5] Click the Tools drop down menu in the top right corner of the page.
  - [a] Select "Print" from the options.
  - [b] When the print dialog box opens, 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 certification statement will be signed no more than 14 days after completion of the inspection and a copy sent to the EPC-CP Program Lead or designee.

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- [a] 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).
- [b] The manager is certifying the information submitted is "true, accurate, and complete" by signing the inspection form.
- [7] Attach the completed, signed, and certified inspection form to the facility SWPPP.
- [8] Submit a copy of the completed form to the MSGP Program Lead.

#### 6.0 TRAINING

The following personnel require training before implementing this procedure.

- DESH Group and Team Leaders
- EPC-CP MSGP stormwater compliance personnel
- DEPs
- Other personnel identified as being required to conduct stormwater assessments 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 Implementation Plan*. This will include "self-study" (required reading) for this procedure as assigned and documented in accordance with ADSH-TPP-301, *ADESH Training Program Plan*.

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 Routine Facility Inspection forms are signed and certified by individual LANL facilities. These completed forms are maintained in the facility's SWPPP and managed by the facility's document management system. 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
EPC-CP-QP-2108 R0 Form 1, MSGP Routine Facility Inspection	$\boxtimes$	

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#### 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.

#### 8.2 Acronyms

See LANL Acronym Master List.

ВМР	Best Management Practice
EPC-CP	Environmental Protection and Compliance – Compliance Programs
DEP	Deployed Environmental Professional
DESH	Deployed Environment, Safety, and Health
FOD	Facility Operations Director
LANL	Los Alamos National Laboratory
MC	Maintenance Connection
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-QP-2108 R0 Form 1, MSGP Routine Facility

*Inspection* in MC Express

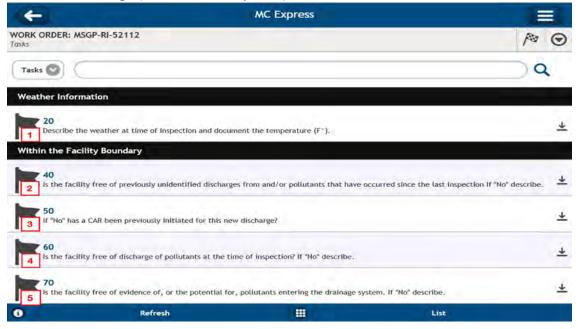
Attachment 2: EPC-CP-QP-2108 R0 Form 1, MSGP Routine Facility Inspection Hard Copy Example

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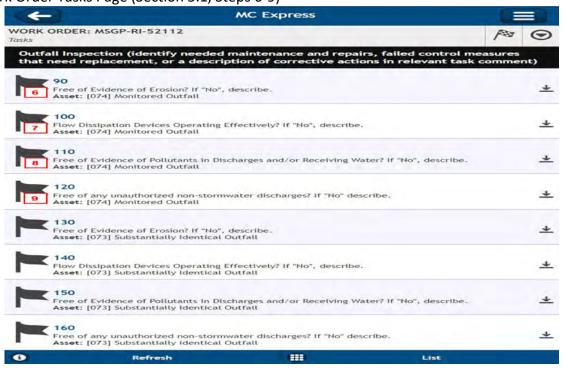
# Attachment 1: Screenshot Examples of EPC-CP-QP-2108 R0 Form 1, MSGP Routine Facility Inspection in MC Express

(Page 1 of 3)

#### Work Order Tasks Page (Section 5.1, Steps 1-5)



#### Work Order Tasks Page (Section 5.1, Steps 6-9)

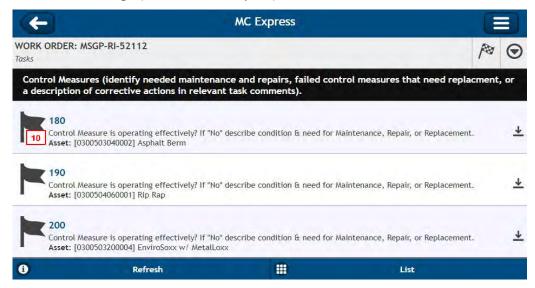


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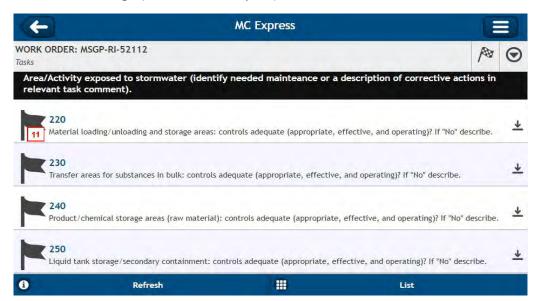
# Attachment 1: Screenshot Examples of EPC-CP-QP-2108 R0 Form 1, MSGP Routine Facility Inspection in MC Express (cont.)

(Page 2 of 3)

Work Order Tasks Page (Section 5.1, Step 11)



#### Work Order Tasks Page (Section 5.1, Step 13)



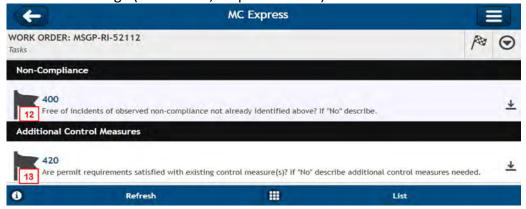
<b>MSGP Routine Facility</b>	,
Inspections	

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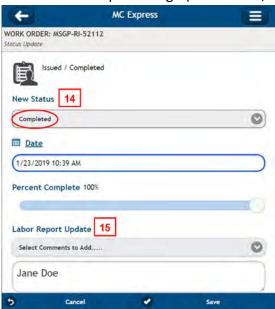
# Attachment 1: Screenshot Examples of EPC-CP-QP-2108 R0 Form 1, MSGP Routine Facility Inspection in MC Express (cont.)

(Page 3 of 3)

Work Order Tasks Page (Section 5.1, Steps 15 and 16)



#### Work Order Status Update Page (Section 5.2, Steps 4-6)



#### Work Order Status Update Page (Section 5.2, Step 7)



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# Attachment 2: *MSGP Routine Facility Inspection* Hard Copy Example, EPC-CP-QP-2108 R0 Form 1 (Page 1 of 3)

os Alamos National Laboratory			Work Order MSGP-RI-52  MSGP Routine Insper Printed 1/23/2019 - 12:45 PM (Duplicate of						
lainte	nance Details								
Reques Taken I	By: Banar, A lure: MSGP R Inspection	19 12:30:00 PM	Target; Priority/Type; Department:	12/31/2020 / Inspection Utilities and Infrastructure	♣ RG12 ♣ TA-3-	Program 1.9 38 Carpen Admin, Ja	ter Sho	ор	
ast PI		213010111111				123-4567			
Reason	1: Example MSG	P Routine Facility	Inspection						
asks									
#	Description				91	Meas.	No	N/A	Yes
Weath 20	er Information  Describe the we	eather at time of in	spection and do	cument the temperature (F°)	1		Г	П	
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	Is the facility fre	e of previously un		rges from and/or pollutants t	hat have oc	curred			
40		spection? If "No"				_	_ G		
50				nis new discharge?			E		
60				time of inspection? If "No" de			10	TI.	- 1
70	Is the facility fre system. If "No"		or the potential for	or, pollutants entering the dra	inage		п	П	П
Outfal	Inspection lider	tify needed mair	ntenance and re	pairs, failed control measu	res that no	ed renlac	ement	ora	
	ption of correctiv				ines that he	co replac	Cilicin,	or a	
90	Monitored Out	fall [074] Free of	Evidence of Eros	ion? If "No", describe.			F	. 17	F
100	Monitored Out	fall [074] Flow Dis	ssipation Devices	Operating Effectively? If "N	o",		Г		Г
			Evidence of Polls	utants in Discharges and/or F	Receiving				
110	Water? If "No",		and the same of				_E		_
400		fall [074] Free of	any unauthorized	non-stormwater discharges	? If "No"		-	_	_
120	describe.	dantinal Outfall (	0701 Fana of Falls	lawas of Francisco 16 (Mia)) de	woodfine =		+	-	- 1
130				lence of Erosion? If "No", de		_	14	11	
140	"No", describe.	Jentical Outrall [	uraj riow Dissip	ation Devices Operating Effe	survey? If		D.	П	
Ver				lence of Pollutants in Discha	irges	-			
150		g Water? If "No",		unauthorized non-stormwate	ar.			F	
160	discharges? If "		oral Free or any	anaduloileed Holl-StollffWatt			E	П	
Contro	ol Measures (iden	tify needed mail	ntenance and re	pairs, failed control measu	res that ne	ed replac	ment.	ora	
	ption of correctiv				7, 7, 7, 7, 7, 7, 7, 7, 7, 7, 7, 7, 7, 7	11/11/20			
180				e is operating effectively? If " ir, or Replacement	No"		r	П	П
190		604060001] Contr d for Maintenance		erating effectively? If "No" delacement.	escribe		Б	П	Г
200	EnviroSoxx w/	MetalLoxx [0300	0503200004] Cor	ntrol Measure is operating eff Repair, or Replacement.	fectively? If		F	П	Г
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	Material loading		orage areas: cor	trols adequate (appropriate,	effective.		-		
220		If "No" describe.	W. (1)	CONTRACTOR OF THE CONTRACTOR O	- T- #		La.	_D	
230	Transfer areas f		bulk, controls ad	equate (appropriate, effective	e, and		-	-	-

MSGP Routine Facility	No: EPC-CP-QP-2108	Page 20 of 21	
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# Attachment 2: MSGP Routine Facility Inspection Hard Copy Example, EPC-CP-QP-2108 R0 Form 1 (cont.)

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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.	ппп
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	0.0.0
Non-C	ompliance	
400	Free of incidents of observed non-compliance not already identified above? If "No" describe	
Additio	onal Control Measures	=
420	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.	ппп
	Report	
	eted: 1/23/2019 10:39:00 AM t: [Additional notes, observations, or site conditions not documented in Task Line Comments field]	
	Jane Doe	
	(lank Dut 1/23/2019	
	//Signature / Name Date Signature / Name m the information as recorded is true, accurate and complete.	Date

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# Attachment 2: MSGP Routine Facility Inspection Hard Copy Example, EPC-CP-QP-2108 R0 Form 1 (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)

Print name and title:	63	
	100	
Signature:	Date:	

EPC-CP-QP-2108 R0 Form 1

# ATTACHMENT 17: EPC-CP-QP-022, MSGP CORRECTIVE ACTIONS

EPC-CP-QP-022	Revision: <b>3</b>
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:**

Name:	Organization:	Signature:	Date:		
Holly Wheeler	EPC-CP	Signature on File	12-19-18		
Derivative Classifier:   Unclassified					
Name:	Organization:	Signature:	Date:		
Jacob Meadows	EPC-CP	Signature on File	12-19-18		

#### **Approval Signatures:**

Subject Matter Expert:	Organization:	Signature:	Date:
Holly Wheeler	EPC-CP	Signature on File	12-19-18
Responsible Line Manager:	Organization:	Signature:	Date:
Terrill Lemke	EPC-CP Team Leader	Signature on File	12-20-18
Responsible Line Manager	Organization	Signature:	Date:
Taunia Van Valkenburg	EPC-CP Group Leader	Signature on File	12-20-18

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Users are responsible for ensuring they work to the latest approved version. To document a required read, Login to <u>UTrain</u>, and go to the Advanced Search.

MSGP Corrective Actions	EPC-CP-QP-022	Page 2 of 31
WISGF Corrective Actions	Revision: 3	Effective Date: 12/20/2018

## **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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Revision: 3 Effective Date: 12/20/2018

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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;
    - o 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, THEN 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

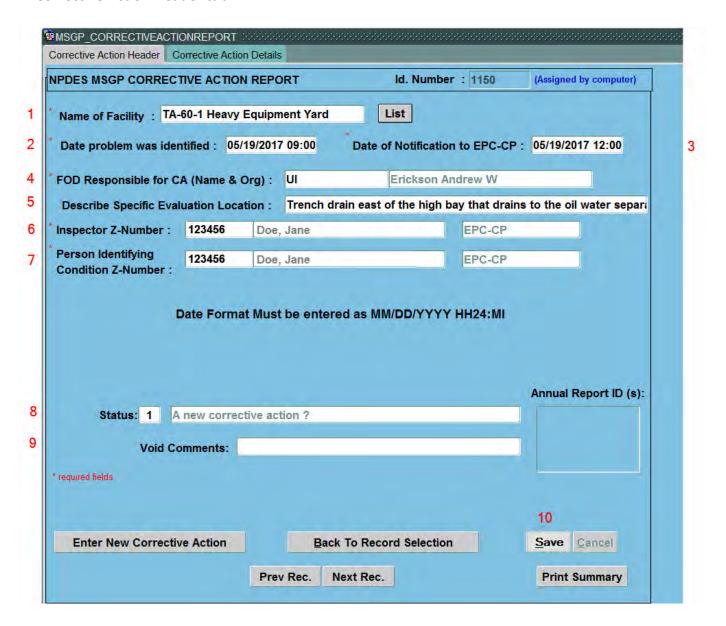
**Attachment 5:** Example Outstanding Corrective Action Report

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## Attachment 1 - Screenshot Example of CAR Database

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#### **Corrective Action Header tab**



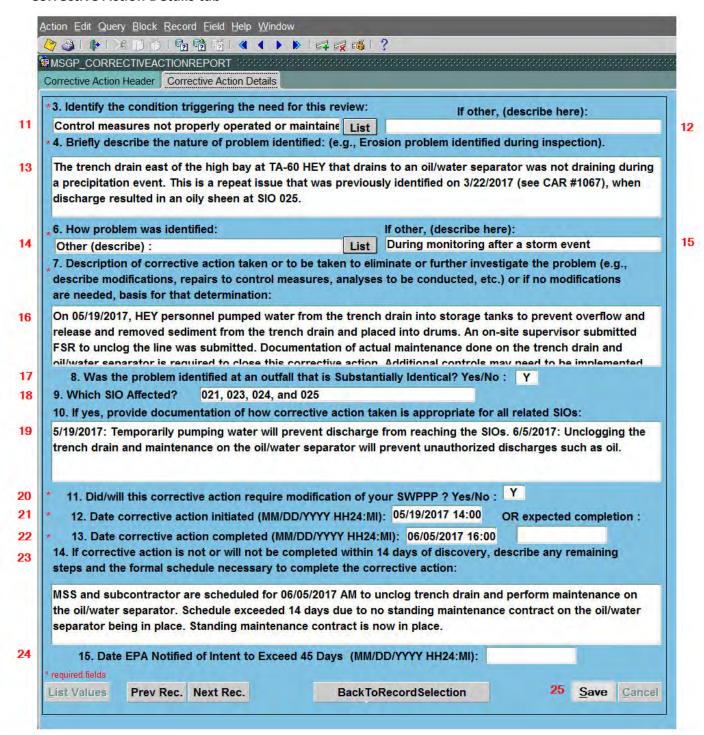
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## Attachment 1 - Screenshot Example of CAR Database (cont.)

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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)

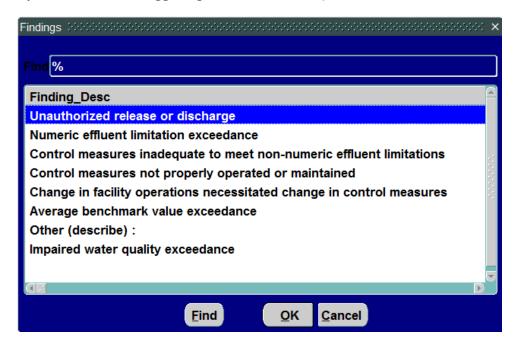


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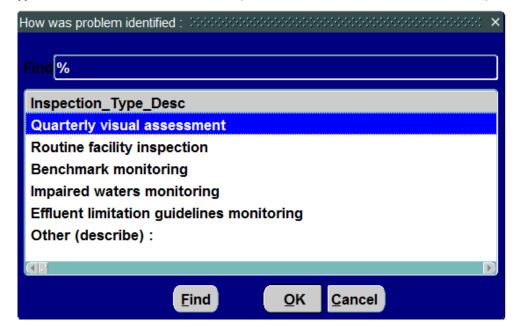
## Attachment 2 – Lists of Limited Values in the CAR Database (cont.)

Page 2 of 2

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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From: MSGPCorrectiveActionDB@esp-esh-as01.lanl.gov [mailto:MSGPCorrectiveActionDB@esp-esh-as01.lanl.gov] 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.

 ${\color{blue} \textbf{Click}} \ \underline{\textbf{HERE}} \ to \ access \ the \ list \ of \ MSGP \ corrective \ action(s) \ not \ yet \ completed \ for \ EWMO.$ 

Click <u>HERE</u> 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 <u>minimum</u> 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

From: MSGPCorrectiveActionDB@esp-esh-as01.lanl.gov [mailto:MSGPCorrectiveActionDB@esp-esh-as01.lanl.gov]
Sent: Monday, January 01, 2018 10:00 PM

To:

Cr.

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 <u>prior to day 45</u> 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-2105, MSGP STORMWATER VISUAL ASSESSMENTS

EPC-CP-QP-2105	Revision: <b>0</b>	Los Alamos	
Effective Date: 05/12/2020	Next Review Date: 05/12/2023	NATIONAL LABORATORY  EST. 1943	

Environment, Safety, Health, Quality, Safeguards, and Security Directorate Environment Protection and Compliance – Compliance Programs Group Quality Procedure

# **MSGP Stormwater Visual Assessments**

Hazard Grading:	Low	Moderate	High/Complex	
•		_		
Usage Level:	Reference	UET	Mixed: UET Sections:	
Status:	New	Major Revision	Minor Revision	
	Review w/N	o Changes	Other: New EPC-CP format and number	pering system
Safety Basis:	⊠ N/A	USQ	USI Number:	
		Document Author	/Subject Matter Expert:	
Name:		Organization:	Signature:	Date:
Holly L. Wheeler		EPC-CP	Signature on File	04-23-20
	Derivativ	re Classifier: 🛛 L	Jnclassified or	
Name:		Organization:	Signature:	Date:
Steven E. Wolfel		EPC-CP	Signature on File	04-23-20
		Approva	al Signatures:	
EPC-CP Reviewer:		Organization:	Signature:	Date:
Alethea Banar		EPC-CP	Signature on File	04-23-20
EPC-CP RLM:		Organization:	Signature:	Date:
Terrill W. Lemke, Te	am Leader	EPC-CP	Signature on File	05-11-20
EPC-CP RLM:		Organization:	Signature:	Date:
Taunia Van Valkenb	urg, Group Leader	EPC-CP	Signature on File	05-12-20

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Users are responsible for ensuring they work to the latest approved version. To document a required read, Login to <u>UTrain</u>, and go to the Advanced Search.

<b>MSGP</b>	Stormwater	Visual
Assess	ments	

No: EPC-CP-QP-2105 Page 2 of 19

Revision: 0 Effective Date: 05/12/2020

# **REVISION HISTORY**

Document Number and Revision [Include revision number, beginning with Revision 0]	Effective Date [Document Control Coordinator inserts effective date]	Effective Date [Document Control Coordinator inserts effective date]
ENV-RCRA-QP-064, R0	7/09	New document MSGP Storm Water Visual Inspections.
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.
EPC-CP-QP-2105, R0	05/12/20	Supersedes EPC-CP-QP-064, R1. Reformat to new EPC-CP template. Re-number procedure and forms to new EPC-CP procedure numbering system.

# 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 permitted outfall locations where LANL conducts stormwater monitoring activities for compliance 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 Stormwater Pollution Prevention Plan (SWPPP). The sample must be visually inspected for water quality characteristics. Stormwater samples are collected with an automated sampler, single stage sampler, or by taking a grab sample. Visual assessments are **not** performed on filtered stormwater.

Visual 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.

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)."

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#### 2.0 PRECAUTIONS AND LIMITATIONS

#### 2.1 Precautions

The hazard level for the activities described in this procedure is **LOW**, therefore and Integrated Work Document (IWD) Part I is not required. If required by a Facility Operations Division (FOD), an IWD Part II (2101 Form) will address any site-specific requirements and training for the FOD.

Personnel must wear appropriate clothing (e.g., boots, long pants, etc.) to perform work in the field.

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).

If conditions prevent field work, document the conditions on the work order. Multiple attempts can be documented on the original form. If the target date cannot be met, the field personnel must contact the Program Lead no less than 24 hours before the target date for guidance.

#### 2.2 Limitations

In MC Express, document responses to each question on a work order by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" line to "Yes". When using a hard copy form, mark the appropriate check box.

Throughout this process, the field personnel will document comments and notations in the "Reading" field of the associated task line. Additional comments not documented in a "Reading" field can be entered in the "Comments" field of the same task line. If field personnel need 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. When using a hard copy form, document comments on the corresponding task line. If additional space is needed, comments can be entered in the "Labor Report" section at the bottom of the form.

Some terminology varies between the MC Express software and the Maintenance Connection (MC) desktop software.

- The "Reading" field in MC Express is the same field as "Reading Final" in MC 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. MC 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 work order is not issued.

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- 2. As specified in the IWD Part II (if applicable), inform (e.g., by e-mail) facility contacts and/or Deployed Environmental Professional (DEP) 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.
- 3. Gather the required equipment (see Section 3.2) for the work to be done.
- 4. Using the Safari or Chrome web browser on a tablet or notebook style computer, log into the MC Express application (http://express.maintenanceconnection.com) and confirm that the work order list displayed matches your sites. If the work order lists do not match, contact EPC-CP Data Management personnel for clarification.
- 5. 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.
- 6. Click on the "Tasks" bar to navigate to the work order Tasks page. See MC Express screen shot examples in Attachment 1.
- 7. Always log out of MC Express when you have finished work OR work is interrupted.

## 3.2 Special Tools, Equipment, Parts, and Supplies

Ensure the following equipment is available in the field vehicle:

- Safety glasses
- Nitrile gloves
- Sturdy hiking boots or steel toed shoes with soles that grip
- Other facility specific personal protective equipment as required by the FOD
- 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) Part II (as needed)
- Site map(s) (as needed)
- Current electronic work order or paper inspection form
- EPC-CP MSGP Sampling and Analysis Plan (SAP) most recent revision for the current monitoring year OR program specific monitoring plan
- Government issued electronic tablet with Safari web browser and Blackberry UEMTM 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

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- Access to accurate time measurement
- Clean replacement sample bottles (clear glass or clear poly)
- Paper towels

#### 4.0 VISUALLY ASSESSING STORMWATER

Stormwater visual assessments are determined at a sampling station based on the current year SAP. See Attachment 1 for screen shot examples of EPC-CP-QP-2105 R0 Form 1, *MSGP Visual Assessment* in MC Express. See Attachment 2 for an example of the form in hard copy format.

**NOTE:** Each item number listed in red font below corresponds to a red numbered box on both screenshots and hard copy format.

## 4.1 Documenting Sample Information

available.

available.

- [1] Take the sample bottle with water out of the automated sampler or single stage jar off the ground or fill a clear sample bottle with a grab sample and wipe off exterior.
  - [a] Grab samples 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] ITEM 1: Document the monitoring period by entering Apr-May, Jun-Jul, Aug-Sep, or Oct-Nov.
  - [a] <u>IF</u> the stormwater discharge collected is from a rain event from the previous monitoring period and the visual assessment is made in the following monitoring period,
    - <u>THEN</u> document monitoring period on the inspection to correspond to the period in which the rain event took place.
- [3] ITEM 2: Check the date and time stormwater discharge began and document by entering the date in the following formats: MM/DD/YY or MM-DD-YY. Time must be entered in 24-hour format.
  - [a] <u>IF</u> the discharge date/time is not available (e.g., precipitation report) when the visual is performed in the field,
     THEN leave this Task Line incomplete and complete when the information is
- [4] ITEM 3: Check the date and time the sample was collected and document by entering the date in the following formats: MM/DD/YY or MM-DD-YY. Time must be entered in 24-hour format.
  - [a] <u>IF</u> the collection date/time is not available (e.g., precipitation report) when the visual is performed in the field,
     THEN leave this Task Line incomplete and complete when the information is

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- [5] ITEM 4: Check the date and time stormwater was visually assessed and document by entering the date in the following formats: MM/DD/YY or MM-DD-YY. Time must be entered in 24-hour format.
- [6] ITEM 5: Describe the nature of the discharge (e.g., rain, snowmelt, hail) and the TOTAL amount of precipitation in inches from the event.
  - [a] IF the total amount of precipitation is not available (e.g., precipitation report) when the visual is performed in the field,
    <u>THEN</u> leave this Task Line incomplete and complete when the information is available.
- [7] ITEM 6: Check the sample was collected in the first 30 minutes of discharge and document.
  - [a] IF it is not possible to collect the sample within the first 30 minutes of discharge,
     THEN the sample must be collected as soon as practicable after the first 30 minutes.
  - [b] The field inspector will document the reason a sample could not be collected within the first 30 minutes (e.g., lightning hazard, flooding).

#### 4.2 Assessing Parameters

While conducting the visual assessment, personnel will attempt to relate any evidence of stormwater pollution that is observed in the sample to a pollutant source on the site. A cleanup of the site can be conducted if the pollutant source is known and well defined. Refer to EPC-CP-QP-2109, MSGP Corrective Actions for specific steps to document, track, and report conditions of potential stormwater pollution.

- [1] **ITEM 7**: Observe the color of the discharge in the sample container. Document by describing the color.
- [2] **ITEM 8**: Observe any odors detected from sample. Document by describing the odor (e.g., musty, sewage, sulfur, sour, solvents, petroleum/gas).
- [3] **ITEM 9**: Observe the clarity of the discharge. Document by describing the clarity (e.g., slightly cloudy, cloudy, opaque).
  - **NOTE 1:** 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.
- [4] **ITEM 10**: Observe any floating solids in the discharge. Document by describing the floating solids.

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- **NOTE 2**: 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).
- [5] **ITEM 11**: Observe any settled solids in the sample. Document by describing the settled solids (e.g., sediment, vegetation, fine, course).
  - **NOTE 3:** Settled solids may be an indicator of unstable ground cover combined with a high intensity stormwater runoff event.
- [6] **ITEM 12**: Observe any suspended solids in the sample. Document by describing the suspended solids (e.g., vegetation, ash, sediment, fine, course).
  - **NOTE 4:** Most often suspended solids include fine sediment. This may be an indication of an unstable channel with eroding banks. Some water may appear to be colored because of relatively fine particulate material in suspension such as sediment.
- [7] ITEM 13: Check the sample is free of foam. Gently shake the sample container. Document by describing any bubbles in or on the surface of the water and the color of the foam.
  - [a] <u>IF</u> it is determined that foam is caused by a pollutant,

    <u>THEN</u> complete the visual assessment and contact the EPC-CP MSGP Program

    Leader **immediately** following completion of the visual assessment.
  - [b] Follow-up action is required within 24 hours (see EPC-CP-QP-2109).
- [8] **ITEM 14**: Check the sample is devoid of any oil sheen. Document by describing the thickness and consistency (e.g., flecks, globs).
  - [a] <u>IF</u> an oil sheen is present, <u>THEN</u> contact the EPC-CP MSGP Program Leader <u>immediately</u> following completion of the visual assessment.
  - [b] Document in the Labor Report (ITEM 17) the source of the oil sheen, if existing BMPs are effective in mitigation of potential pollutants, and if a new BMP needs to be installed.
  - [c] Follow-up action is required within 24 hours (see EPC-CP-QP-2109).
- [9] **ITEM 15**: Check the discharge is free of any other indicators of stormwater pollution not described in any other task line above.
- [10] <u>IF</u> there are any potential sources of pollutants observed on site, <u>THEN</u> document the following and contact the EPC-CP MSGP Program Lead within 24 hours of identification:
  - Potential sources;

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- Indicate if there are Best Management Practices (BMPs) on site;
- Evaluate whether the BMPs are working correctly or need maintenance;
- Evaluate whether implementation of additional BMPs are needed to address the observed contaminant.
- [11] Contact the FOD, DEP, and EPC-CP MSGP representative to inform them of the situation.
  - **NOTE 5:** Refer to EPC-CP-QP-2109, MSGP Corrective Actions for specific steps to document, track, and report conditions of potential stormwater pollution.
- [12] After all task lines have been completed, make sure you have clicked the "Save" bar at the bottom of the page.

## 4.3 Completing the Visual 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 "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 to open the Work Order Status Update page. MC Express auto-populates the date and time fields.

#### **CAUTION**

MC Express automatically changes the work order status to "Closed."

- [4] 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.
  - [a] Ensure the date and time that is auto-populated is the date and time that the work was completed and *not* the date/time the form was filled out.
  - [b] <u>IF</u> work is performed over multiple days, <u>THEN</u> note the date and time the work began in the Labor Report field.
  - [c] To update the date or time, click the "Date" field and make necessary adjustments using the available timestamp application. Click "Set" to apply changes.
  - [d] <u>IF</u> using a hard copy form, <u>THEN</u> write the date and time the work was completed.
- [5] ITEM 17: The field personnel must type or write his/her name in the "Labor Report Update" field.

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- [6] 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" 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.
  - [a] **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:** The mouse must be used to sign electronically when using MC Express on a desktop screen (not a tablet).
  - [b] If using a hard copy form, the field personnel will sign his/her name and the date of when the form was signed.
  - [c] By signing either electronically or on hard copy, the field personnel is certifying that the information submitted is "true, accurate, and complete".
- [8] Click on the "Save" bar at the bottom of the page to close the "Signature" field.

#### 4.4 Completing the Certification Statement

EPC-CP will send completed visual assessment forms to the DEPs 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.

#### 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 Implementation Plan. This will include "self-study" (required reading) for this procedure as assigned and documented in accordance with ADESH-TPP-301, ADESH Training Program Plan. Other participating LANL groups may require training to local procedures and document completion of training.

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.

#### 6.0 RECORDS

EPC-CP is the Office of Record for this document. It must be maintained in accordance with PD1020, Document Control and Records Management and ADESH-AP-006, Records Management Plan. Records generated by this document will be submitted to the Records Management designated point of contact or document manager for document management.

### MSGP Stormwater Visual Assessments

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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
EPC-CP-QP-2105 R0 Form-1, MSGP Visual Assessment	$\boxtimes$	

#### 7.0 DEFINITIONS AND ACRONYMS

#### 7.1 Definitions

See LANL <u>Definition of Terms</u>.

**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).

**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.

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**Unstaffed and Inactive Sites** – A facility maintaining certification with the SWPPP that it is inactive and unstaffed and visual examinations are not required.

#### 7.2 Acronyms

See LANL <u>Acronym Master List</u>.

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	Maintenance Connection
MC Express	Maintenance Connection MC Express web application
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SAP	Sampling and Analysis Plan
SWPPP	Stormwater Pollution Prevention Plan

#### 8.0 REFERENCES

EPC-CP-QP-2109, MSGP Corrective Actions

EPC-CP-PIP-2101, NPDES Multi-Sector General Permit Program Implementation Plan

ADESH-TPP-301, ADESH Training Program Plan

ADESH-AP-006, Records Management Plan

PD1020, Document Control and Records Management

#### 9.0 ATTACHMENTS

Attachment 1: Screenshot Examples of EPC-CP-QP-2105 R0 Form 1, MSGP Visual Assessment in MC

**Express** 

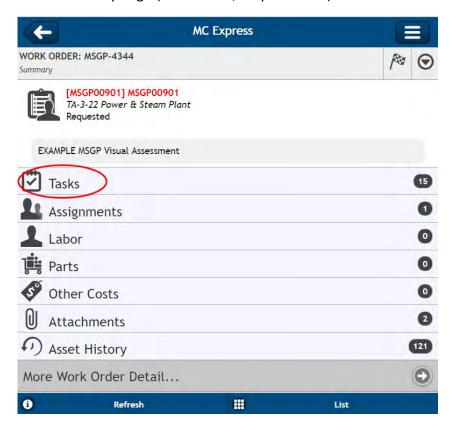
Attachment 2: EPC-CP-QP-2105 R0 Form 1, MSGP Visual Assessment Hard Copy Example

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### Attachment 1: Screenshot Examples of EPC-CP-QP-2105 R0 Form 1, MSGP Visual Assessment in MC Express

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Work Order Summary Page (Section 3.1, Steps 5 and 6)

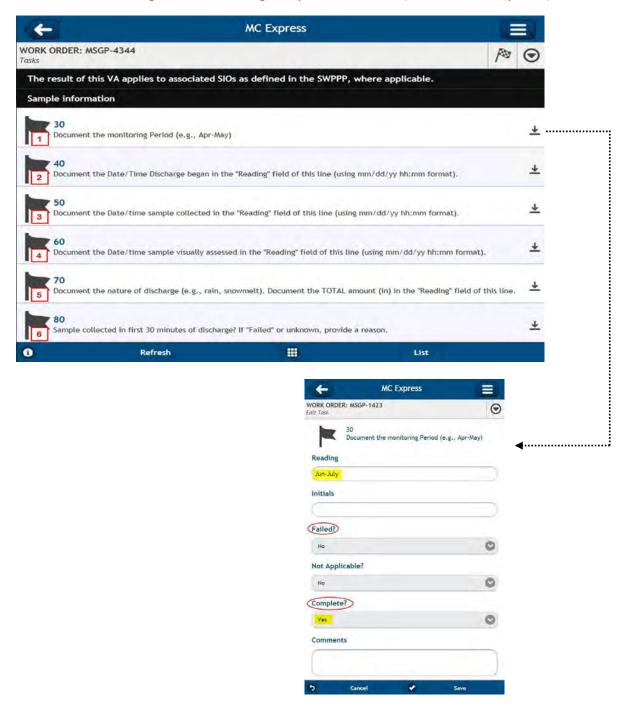


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### Attachment 1: Screenshot Examples of EPC-CP-QP-2105 R0 Form 1, MSGP Visual Assessment in MC Express (cont.)

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Work Order Tasks Page - Documenting Sample Information (Section 4.1, Steps 2-7)

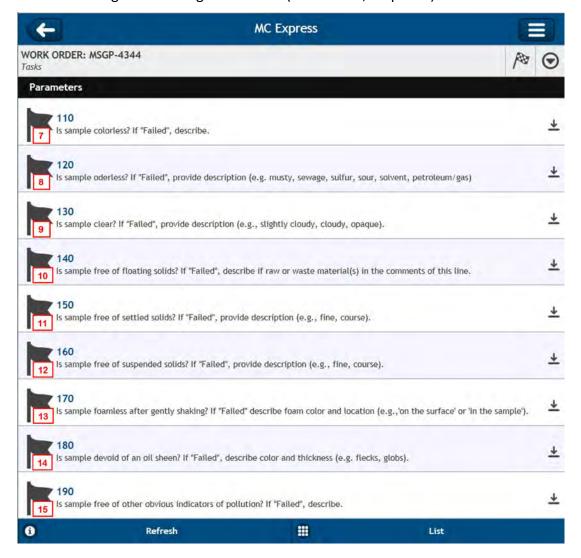


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### Attachment 1: Screenshot Examples of EPC-CP-QP-2105 R0 Form 1, MSGP Visual Assessment in MC Express (cont.)

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Work Order Tasks Page – Assessing Parameters (Section 4.2, Steps 1-9)



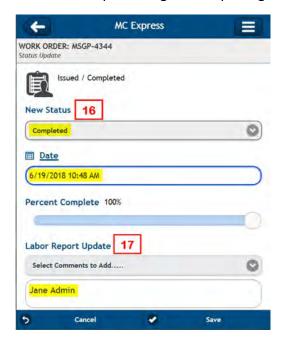
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### Attachment 1: Screenshot Examples of EPC-CP-QP-2105 R0 Form 1, MSGP Visual Assessment in MC Express (cont.)

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Work Order Status Update Page – Completing the Form (Section 4.3, Steps 4-7)



Work Order Status Update Page (Section 4.3, Step 7)



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### Attachment 2: EPC-CP-QP-2105 R0 Form 1, MSGP Visual Assessment Hard Copy Example (Page 1 of 2)

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### Attachment 2: EPC-CP-QP-2105 R0 Form 1, MSGP Visual Assessment Hard Copy Example (cont.) (Page 2 of 2)

	CERTIFICATION STATEMENT
a system designed to assure that quali the person or persons who manage the is, to the best of my knowledge and be	s document and all attachments were prepared under my direction or supervision in accordance with fied personnel properly gathered and evaluated the information submitted. Based on my inquiry of system, or those persons directly responsible for gathering information, the information submitted blief, true, accurate, and complete. I am aware that there are significant penalties for submitting fals of fine and imprisonment for knowing violations.
(Signatory must meet definition in S	Section B.11.A, eg. FOD, Ops Mgr, DESH Group Leader, EPC Group Leader)
Print name and title:	Marie Comment

EPC-CP-QP-2105 R0 Form 1

### ATTACHMENT 19: EPC-CP-TP-2103, INSPECTING ISCO STORMWATER RUNOFF SAMPLERS AND RETRIEVING SAMPLES

EPC-CP-TP-2103	Revision: <b>0</b>	Los Alamos
Effective Date: 02/24/2020	Next Review Date: 02/24/2023	NATIONAL LABORATORY EST. 1943

Environment, Safety, Health, Quality, Safeguards, and Security Directorate

Environment Protection and Compliance – Compliance Programs Group

Technical Procedure

# Inspecting ISCO Stormwater Runoff Samplers and Retrieving Samples

Hazard Grading:	Low		☐ High/Complex	
Usage Level:	Reference	UET	Mixed: UET Sections:	
Status:	New	Major Revision	Minor Revision	
	Review w/No	Changes	Other: New EPC-CP format and numbering	ng system
Safety Basis:	⊠ N/A	USQ	USI Number:	
	ı	Document Author	/Subject Matter Expert:	
Name:		Organization:	Signature:	Date:
Holly L. Wheeler		EPC-CP	Signature on File	02-20-2020
	Derivativ	e Classifier: 🔀 l	Jnclassified or	
Name:		Organization:	Signature:	Date:
Steven E. Wolfel		EPC-CP	Signature on File	02-19-2020
		Approv	al Signatures:	
EPC-CP Reviewer:		Organization:	Signature:	Date:
Terrill W. Lemke		EPC-CP	Signature on File	02-19-2020
EPC-CP RLM:		Organization:	Signature:	Date:
Taunia Van Valkenb	urg	EPC-CP	Signature on File	02-24-2020

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Users are responsible for ensuring they work to the latest approved version. To document a required read, Login to <u>UTrain</u>, and go to the Advanced Search.

<b>Inspecting ISCO Stormwater Runoff</b>
Samplers & Retrieving Samples

 No: EPC-CP-TP-2103
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 Revision: 0
 Effective Date: 02/24/2020

#### **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-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.  Added crosswalk to electronic form in MC Express.
EPC-CP-TP-2103 R0	02/24/2020	Supersedes EPC-CP-QP-047 R2. Reformat to new EPC-CP template. Re-number procedure and forms to new EPC-CP procedure numbering system. Minor edits.

# Inspecting ISCO Stormwater Runoff Samplers & Retrieving Samples

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Revision: 0 Effective Date: 02/24/2020

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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) at 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 automated samplers and retrieving stormwater runoff samples from outfall locations where LANL conducts stormwater monitoring pursuant to NPDES MSGP requirements. This procedure may also be used for other Associate Laboratory Directorate of Environment, Safety, Health, Quality, Safeguards, and Security (ESHQSS) stormwater monitoring activities as needed.

#### 1.2 Scope

The discharge of stormwater from specified industrial sites at LANL is regulated under the NPDES MSGP. The Laboratory's MSGP requires qualitative and quantitative stormwater monitoring (e.g., sample collection) to evaluate the effectiveness of control measures. Automated ISCO samplers coupled with liquid level actuators are used at MSGP monitoring stations and in support of other stormwater monitoring programs. Refrigerated (Avalanche®) and/or non-refrigerated (Model 3700) samplers are deployed and configured with multi-battery arrays, solar panels, and surge protectors.

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 the MSGP Program Lead.

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.)

#### 1.3 Applicability

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 or other stormwater monitoring programs.

The MSGP Program Lead is primarily 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.

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#### 2.0 PRECAUTIONS AND LIMITATIONS

#### 2.1 Precautions

The hazard level of the activities in this procedure is **MODERATE**. Hazards in the work described in this procedure are controlled thorough a site specific Integrated Work Document (IWD) Part I. The IWD Part II (Form 2101) addresses site specific requirements and training by the Facility Operations Division (FOD).

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.

Personnel must wear appropriate clothing (e.g., boots, long pants, etc.) to perform work in the field.

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).

In the event of pest infestation (e.g., wasp or rat nests), do not attempt to remove the pest yourself. Call LANL Pest Control to coordinate the removal of the pest(s).

If conditions prevent field work, document the conditions in the Labor Report Update field on the form and notify the Program Lead or designee within 24 hours. Multiple attempts can be documented on the original form. If the target date cannot be met, the field personnel must contact the Program Lead no less than 24 hours before the target date for guidance.

#### 2.2 Limitations

In MC Express, document responses to each question on a work order by clicking the expand arrow located on the right side of the task line and changing the "Complete" or "Failed" or "N/A" line to "Yes". When using a hard copy form, mark the appropriate check box.

Throughout this process, the field personnel will document comments and notations in the "Reading" field of the associated task line. Additional comments not documented in a "Reading" field can be entered in the "Comments" field of the same task line. If field personnel need more space, additional comments can be entered in the "Labor Report Update" field (see Section 4.10) when the work order is updated to "Complete" status. When using a hard copy form, document comments on the corresponding task line. If additional space is needed, comments can be entered in the "Labor Report" section at the bottom of the form.

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.

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• 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. 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 (MST) at all times, with no daylight saving time adjustment.
- 2. 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.
- 3. Obtain any necessary additional paperwork before conducting this work, including IWD's, and excavation permits (as necessary).
- 4. As specified in the IWD, inform (e.g., by e-mail) facility contacts and/or Deployed Environmental Professional of the schedule for sampler work and locations up to a week before (preferred), but no later than the day before (for minor changes) so work may be added to the appropriate plan of the day.
  - **NOTE:** For some 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.
- 5. Gather the required equipment (see Section 3.3) 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 (http://express.maintenanceconnection.com) and confirm that the work order list displayed matches your sites. If the work order lists do not match, contact EPC-CP Data Management personnel for clarification.
- 8. 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.
- 9. Click on the "Tasks" bar to navigate to the work order Tasks page. See MC Express screen shot examples in Attachment 1.
- 10. Always log out of MC Express when you have finished work OR if work is interupted.

#### 3.2 Performance Documents

Personnel performing this procedure will be familiar with the most current versions of the following plans and operation manuals if this equipment is utilized. Copies of the following are not required to be on the job site.

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- EPC-CP MSGP Sampling and Analysis Plan (SAP) most recent revision for the current monitoring year OR project specific monitoring plan;
- ISCO 3700 Portable Samplers Installation and Operation Guide;
- ISCO Avalanche® Installation and Operation Guide; or
- ISCO 701 pH/Temperature Module Installation and Operation Guide (if equipped at a station).

#### 3.3 Special Tools, Equipment, Parts, and Supplies

Ensure the following equipment is available.

- Safety glasses;
- Sturdy hiking boots or steel toed shoes (as needed) with soles that grip and other required facility specific Personal Protective Equipment;
- Nitrile gloves;
- Leather gloves;
- 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 the IWD;
- EPC-CP MSGP SAP most recent revision for the current monitoring year OR project specific monitoring plan;
- Site Map(s) (as needed);
- Current electronic or paper inspection form EPC-CP-TP-2103 Form 1, MSGP ISCO Sampler Inspection and Sample Retrieval;
- Government issued electronic tablet with Safari or Chrome 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);
- Water Sample Collection and Processing Log/Field Chain of Custody (SCPL) (see EPC-CP-QP-2106);
- Access to accurate time measurement;
- Necessary access and station keys;
- Insulated hand tools;
- Charged spare battery(s);

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- 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<sup>®</sup>;
- Paper Towels;
- Marker pen (permanent, waterproof);
- Ball point pen;
- Re-sealable zipper storage bags (e.g., Ziploc®);
- Custody seals; and
- 0.45 micron filter (where applicable).

#### 4.0 INSPECTING THE SAMPLER AND SAMPLE RETRIEVAL

Inspection of ISCO samplers is performed weekly during the sampling season. Samples retrieved are determined at a sampling station based on the current year SAP. See Attachment 1 for screen shot examples of EPC-CP-TP-2103 R0 Form 1, ISCO Sampler Inspection and Sample Retrieval in MC Express. See Attachment 2 for an example of the form in hard copy format.

**NOTE:** 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).

#### 4.1 Inspecting the Sampler

#### 4.1.1 On Arrival

- [1] Remove the top cover from the sampler.
- [2] ITEM 1: Check and document the sampler is ON and its condition upon arrival. Explain any non-functional status.
  - [a] <u>IF</u> a sampler has been inactivated (e.g., sample collection completed) prior to this inspection but continues to appear on the inspection form, <u>THEN</u> answer this task line question "N/A."
  - [b] Subsequent questions regarding the inactive sampler may be left unanswered in this section.

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- [3] ITEM 2: Check and document the ISCO programming displays the following.
  - [a] ISCO 3700 sampler display should indicate "Sampler Inhibited"
  - [b] Avalanche sampler display should indicate "Program Disabled"
  - [c] Document messages other than those in [a] and [b] (e.g., "Done X samples," "sampler off," etc.,).
- [4] <u>IF</u> there is no indication of flow and the sampler triggered due to a non-flow event, <u>THEN</u> describe why the sampler triggered (e.g., animal, tumbleweed, etc.,).
- [5] ITEM 3: Check and document the sampler is set to the correct MST +/- no more than 1 minute. Do **NOT** use Daylight Savings Time.
  - [a] <u>IF</u> the sampler is set incorrectly, <u>THEN</u> reprogram for the correct MST.
  - [b] Describe the work performed and correction applied (e.g., "ISCO clock was X minutes slow").
- [6] If the location has more than one sampler, complete Steps 1 through 5 for each sampler.

#### 4.1.2 Water Collection Information

- [1] Don nitrile gloves and safety glasses.
- [2] Remove the center section from the sampler.
- [3] ITEM 4: Document evidence of storm water flow at the sampling location by describing the evidence of flow (e.g., sediment or vegetation movement, erosion, standing water).
  - [a] <u>IF</u> the sampler did not trip but there is evidence of flow, <u>THEN</u> document the date and time storm water discharge began from the precipitation report.
  - [b] IF the sampler tripped or collected storm water, THEN document the date/time stamp from the sampler (or from the precipitation report if the sampler did not record a date/time stamp).
- [4] **ITEM 5**: Document that storm water is collected.
  - [a] Document if the water is taken by grab sample.
  - [b] Complete the Bottle Information (ITEM 20) in Section 4.1.7.
  - [c] Follow the steps in thru Section 4.2 Step 16 to retrieve samples.
- [5] ITEM 6: For Avalanche samplers only, record the current refrigerator temperature in degrees Celsius (°C) when water is collected.

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- [a] <u>IF</u> unable to review the temperature, <u>THEN</u> check "No" and describe the condition (e.g., dead battery, electrical short).
- [6] ITEM 7: For Avalanche samplers equipped with an ISCO pH and Temp Module, check and document a pH measurement was taken on the collected water.
  - [a] Record the pH measurement taken at the time Bottle 1 was filled as "Average:Minimum:Maximum."
  - [b] <u>IF</u> unable to review the pH, <u>THEN</u> check "No" and describe the condition (e.g., damaged meter).

#### 4.1.3 Water Retrieval Information

- [1] ITEM 8: Check and document whether a sample volume was retrieved from the sampler and taken off site.
  - [a] Record the estimated total volume in liters (L) or milliliters (ml) taken off site.
- [2] ITEM 9: Check and document whether a visual assessment of the water was performed (refer to EPC-CP-QP-2105).
  - [a] Do **NOT** conduct a visual assessment on a filtered sample. Record "Filtered sample."

#### 4.1.4 On Departure

#### WARNING

You MUST be trained to LANL electrical safety standards as prescribed in the IWD before performing Steps 2 and 3.

- Prepare yourself in accordance with the IWD for electrical work (e.g. wear safety glasses and leather gloves, use insulated tools, no jewelry or anything metal hanging from body, etc.,).
- [2] **ITEM 10**: Check that all cable and electrical connections are attached and firmly tightened (not loose) upon departure.
  - **NOTE:** Connections may work loose over time due to temperature changes and if there are dis-similar metals at the connection points. The loose connections can introduce voltage spikes, which inherently cause current spikes that may result in blown fuses.
  - [a] <u>IF</u> the cables require replacement, connections require tightening, or other maintenance performed,
     <u>THEN</u> describe the work performed (e.g., "tightened connectors on battery).
  - [b] <u>IF</u> maintenance cannot be completed at the time of inspection,

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<u>THEN</u> describe the condition (e.g. cables chewed through by animal) and follow-up work needed (e.g., replace cables).

- [3] **ITEM 11**: Use a voltage meter to check the power supply.
  - [a] Record the voltage of the battery(ies) in volts (V).
  - [b] Document if battery voltage is acceptable upon departure from the site (≥11.7 for non-floating charged batteries at ISCO 3700 samplers and ≥11.0 for floating-charged batteries at Avalanche samplers).
  - [c] Replace a battery with a charged battery when the voltage is not acceptable.
  - [d] Check the voltage of the solar panel if access can be gained to the weather protected terminal covers on the back of the panel.
  - [4] Contact the program Electrical Safety Officer if any issues with wiring or batteries cannot be resolved on site.

#### 4.1.5 Equipment Specific Tasks

- [1] ITEM 12: Check and document the sampler passes the diagnostic test. (Refer to EPC-CP-TP-2102 or sampler Operator's Guide for instructions on running a diagnostics test.)
  - [a] <u>IF</u> a sampler has been inactivated (e.g., sample collection completed) prior to this inspection but continues to appear on the inspection form,
     <u>THEN</u> answer this task line question as "N/A." Subsequent questions regarding this sampler may be left unanswered in this section.

#### **CAUTION**

Only reset the pump counts after replacing the internal pump tubing.

- [2] <u>IF</u> the internal pump tubing has reached or exceeded the preset pump counts (500,000 for ISCO 3700s, 1,000,000 for Avalanches),
  - THEN replace the pump tubing and reset the pump counts.
- [3] **ITEM 13**: Check and document the sample tubing is free or clear of debris.
  - [a] Clear obstructions as needed and document maintenance performed.
- [4] Check the physical condition of sample tubing and vent tubing.
  - [a] Replace tubing as needed and document maintenance performed.
- [5] **ITEM 14**: Check and document the sample tubing has passed a suction test.
- [6] **ITEM 15**: Check and document the sampler is ON prior to departing the site.
- [7] **ITEM 16**: Check and document the liquid level actuator has been set to "Latch" prior to departing the site.

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- [a] <u>IF</u> the sampler tripped and requires reset of the sampling program, <u>THEN</u> reset the actuator by toggling the switch to "Reset" and back to "Latch."
- [8] ITEM 17: Check and document the ISCO programming displays the following.
  - [a] ISCO 3700 sampler display should indicate "Sampler Inhibited."
  - [b] Avalanche sampler display should indicate "Program Disabled."
  - [c] Reprogram the sampler as needed and document maintenance performed.
- [9] Replace and secure the sampler top cover and secure the sampler shelter (if sampler is in a shelter).
- [10] If the location has more than one sampler, complete Steps 1 through 11 for each sampler.

#### 4.1.6 Maintenance Information

- [1] **ITEM 18**: Document maintenance completed while on site that is not documented elsewhere on the work order by describing the work performed.
  - **NOTE**: 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.
- [2] <u>IF</u> a battery was replaced,
  - THEN record the voltage of the new battery and the battery identification number.
  - [a] <u>IF</u> the battery does not have an identification number, THEN:
    - Contact the MSGP Program Lead to have one assigned.
    - Paint or write the number in a permanent manner on the battery.
- [3] **ITEM 19**: Document if maintenance is needed that was not completed while on site and that is not documented elsewhere on the work order.
  - [a] Describe on the work order the follow-up maintenance needed.
  - [b] When the maintenance has been complete, describe the actions taken to complete the work on the original work order.
  - [c] Record the maintenance completion date and time on the original work order.

#### 4.1.7 Bottle Information

[1] **ITEM 20**: Document water collected by recording the following information for each bottle by position number in the carousel.

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- Date (MM/DD/YY or MM-DD-YY) and time the ISCO collected water,
- · Volume (L or ml) of water in the bottle,
- Type of bottle (e.g. G for glass, P for poly),
- Specific ISCO displayed message, if present.
- [2] <u>IF</u> the sampler(s) did not trigger,
  - <u>THEN</u> answer the task line question as "N/A" for Bottle #1 of each sampler and leave the other Bottle task lines unanswered.
- [3] IF a sampler has been inactivated (e.g., sample collection completed) prior to this inspection but continues to appear on the inspection form,
  <u>THEN</u> answer the task line question as "N/A". Subsequent questions regarding this
- [4] Proceed to Section 4.4 if no water was collected.

sampler may be left unanswered in this section.

#### 4.2 Retrieving Samples

Refer to the flow diagram in Attachment 3 as an aid in determining sample retrieval.

- [1] Don nitrile gloves and safety glasses.
- [2] Add up the estimated volume of water collected in the sampler.
- [3] Check that the estimated total volume of water in glass and poly matches the required volume for the specific location identified in the MSGP SAP.
  - **NOTE 1:** The volume of water required to complete analytical may vary by monitored location.
  - [a] <u>IF</u> the sample volume is sufficient to fulfill all analytical requirements, <u>THEN</u> continue to Step 4.
  - [b] <u>IF</u> the sample volume is sufficient to fulfill part of the analytical requirements, <u>THEN</u> consult the prioritization order on the MSGP SAP to determine which analytical to fulfill,
    - <u>OR</u> contact the MSGP Data Manager. Continue to Step 4 but retrieve only the volume needed.
  - [c] <u>IF</u> the collected sample will NOT fulfill the minimum required volume for any analytical,

#### THEN:

- Complete a Visual Assessment if the sample is not filtered (refer to EPC-CP-QP-2105),
- Record estimated total volume (L or ml) retrieved as "0" in ITEM 8,

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- Return all water to the ground at the sampling location,
- Skip to Step 11.

#### **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. Samples do not meet preservation requirements.

- [4] Remove filled and partially filled bottles from the carousel one at a time.
- [5] For samples to be retrieved,
  - [a] Immediately place lids onto the sample bottles.
  - [b] Securely seal the lids.
  - [c] Place a custody seal on each bottle.
- [6] Write the following on each retrieved sample bottle.
  - Date and time collected (e.g., recorded by the ISCO sampler)
  - Sampler Location number
- [7] Conduct a Visual Assessment on a non-filtered sample (refer to EPC-CP-QP-2105).
- [8] Record estimated total volume (L or ml) retrieved in ITEM 8.
- [9] Place retrieved sample bottles in a cooler with blue ice (or equivalent).
- [10] Return any excess stormwater collected that exceeded the amount required to the ground at the location collected.
- [11] Install new certified clean sample bottles in the carousel to replace retrieved bottles.
  - [a] The number and type of bottles may vary. Ensure bottles match the configuration specified in the MSGP SAP.
- [12] Replace the 0.45-micron filter as needed.
  - **NOTE 2:** Consult the most current revision of the MSGP SAP for specifics.
- [13] <u>IF</u> the sampler is turned OFF for the quarter but new certified clean sample bottles and/or the filter have not been replaced,
  - THEN note this as follow-up maintenance required in ITEM 19.
- [14] Replace and secure the center section of the sampler.
- [15] If the location has more than one sampler, complete Section 4.1.7 thru Section 4.2 for each sampler.
- [16] Return to Section 4.1.2, Step 5.

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#### 4.3 Removing Stormwater Samples from the field

- [1] Transport retrieved samples and corresponding SCPL (see EPC-CP-QP-2106) to the EPC-CP Stormwater Program Laboratory at TA-59-1.
- [2] Sign and date/time the SCPL and place it with the samples in the refrigerator.
- [3] Ensure custody seal is intact on each sample bottle.
- [4] Refer to EPC-CP-QP-2106, *Processing MSGP Stormwater Samples* for processing and submitting samples for shipping to the SMO.
- [5] Ensure the EPC-CP Stormwater Program Laboratory door is locked upon exit.

#### 4.4 Completing the Inspection Form

See Attachment 1 for completing the form in MC Express and Attachment 2 for a hard copy example.

- [1] After 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 to open the Work Order Status Update page. MC Express auto-populates the date and time fields.

#### CAUTION

MC Express automatically changes the work order status to "Closed."

- [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.
  - [a] Ensure the date and time auto-populated are the date and time the work was completed and not the date/time the form was filled out.
  - [b] <u>IF</u> work is performed over multiple days, <u>THEN</u> note the date and time the work began in the Labor Report field.
  - [c] To update the date or time, click the "Date" field and make necessary adjustments using the available timestamp application. Click "Set" to apply changes.
  - [d] <u>IF</u> using a hard copy form, <u>THEN</u> write the date and time the work was completed.
- [5] ITEM 22: The field personnel must type or write his/her name in the "Labor Report Update" field.

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- [6] Additional notes, observations, or site conditions not documented in a task line "Reading" or "Comments" field can 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.
  - [a] ITEM 23: Capture an electronic signature by drawing with a finger on the tablet screen.
    - **NOTE:** The mouse must be used to sign electronically when using MC Express on a desktop screen (not a tablet).
  - [b] If using a hard copy form, the field personnel will sign his/her name and date when the form is signed.
  - [c] The field personnel is certifying that the information submitted is "true, accurate, and complete" by electronically signing work order.
- [8] Click on the "Save" bar at the bottom of the page to close the "Signature" field.
- [9] <u>IF</u> completing a hard copy, THEN return the form to the MSGP Program Lead.

#### 5.0 TRAINING

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.

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 ADESH-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.

#### 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 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.

### **Inspecting ISCO Stormwater Runoff Samplers & Retrieving Samples**

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Record Title	QA Record	Non-QA Record
EPC-CP-TP-2103 R0 Form 1, ISCO Sampler Inspection and Sample Retrieval	$\boxtimes$	

#### 7.0 DEFINITIONS AND ACRONYMS

#### 7.1 Definitions

See LANL *Definition of Terms*.

#### 7.2 Acronyms

See LANL Acronym Master List.

°C	Degrees in Celsius
EPC-CP	Environmental Protection and Compliance-Compliance Programs
FOD	Facility Operations Division
IWD	Integrated Work Document
L	Liter
LANL	Los Alamos National Laboratory
MC Express	Maintenance Connection MC Express web application
ml	Milliliter
MSGP	Multi-Sector General Permit
MST	Mountain Standard Time
NPDES	National Pollutant Discharge Elimination System
SAP	Sampling and Analysis Plan
SCPL	Sample Collection and Processing Log/Field Chain of Custody
V	Volts

#### 8.0 REFERENCES

EPC-CP-QP-2105, MSGP Stormwater Visual Assessments

EPC-CP-QP-2106, Processing MSGP Stormwater Samples

EPC-CP-TP-2102, Installing, Setting Up, and Operating ISCO Samplers

EPC-CP-PIP-2101, NPDES Multi-Sector General Permit Program Implementation Plan

ADESH-TPP-301, ADESH Training Program Plan

ADESH-AP-006, Records Management Plan

PD1020, Document Control and Records Management

<b>Inspecting ISCO Stormwater Runoff</b>
Samplers & Retrieving Samples

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#### 9.0 ATTACHMENTS

**Attachment 1:** Screenshot Examples of EPC-CP-TP-2103 R0 Form 1, *ISCO Sampler Inspection and Sample Retrieval* in MC Express

**Attachment 2:** EPC-CP-TP-2103 R0 Form 1, *ISCO Sampler Inspection and Sample Retrieval* Hard Copy Example

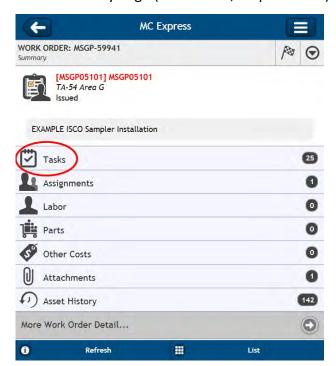
**Attachment 3:** Sample Retrieval Flow Diagram

<b>Inspecting ISCO Stormwater Runoff</b>
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Work Order Summary Page (Section 3.1, Steps 8 and 9)

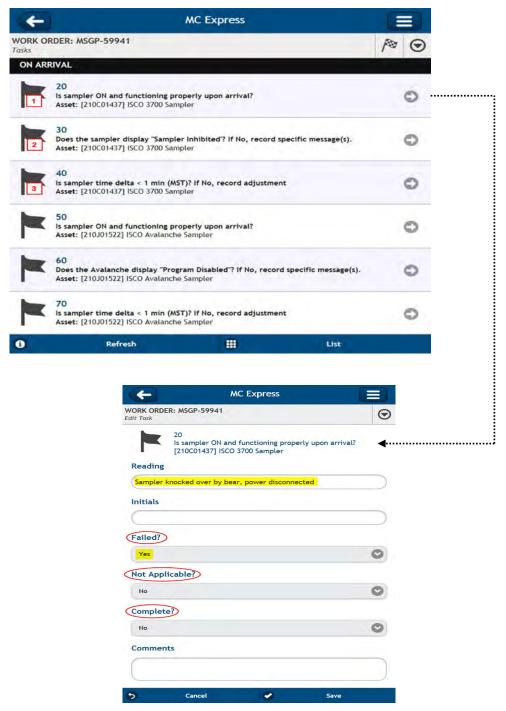


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Work Order Tasks page - On Arrival (Section 4.1.1, Steps 2-5)

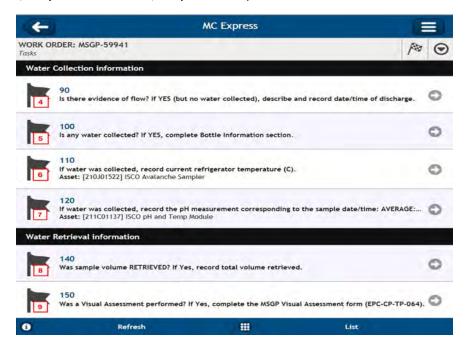


<b>Inspecting ISCO Stormwater Runoff</b>
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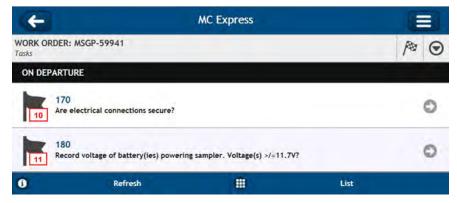
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Work Order Task Page – Water Collection Information and Water Retrieval Information (Sections 4.1.2, Steps 3-6 and 4.1.3, Steps 1 and 2)



Work Order Task Page - On Departure (Sections 4.1.4, Steps 2 and 3)

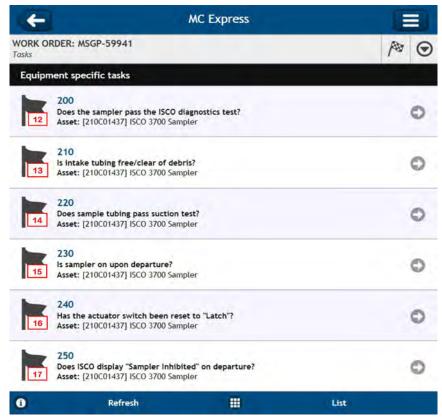


<b>Inspecting ISCO Stormwater Runoff</b>
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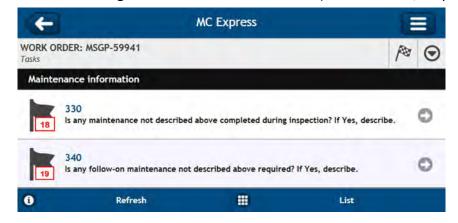
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Work Order Task Page – Equipment Specific Tasks (Sections 4.1.5, Steps 1-8)



Work Order Task Page – Maintenance Information (Sections 4.1.6, Steps 1-3)

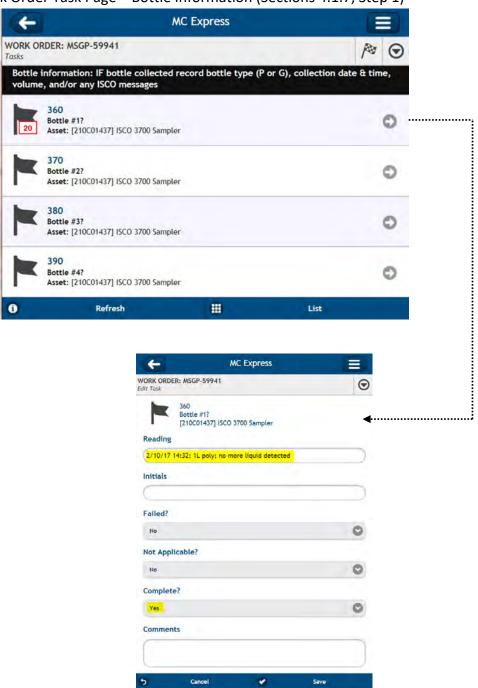


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Work Order Task Page – Bottle Information (Sections 4.1.7, Step 1)



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Work Order Status Update Page (Section 4.4, Steps 4 and 5)



Work Order Status Update Page (Section 4.4, Step 7)



# Inspecting ISCO Stormwater Runoff Samplers & Retrieving Samples

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### Attachment 2: EPC-CP-TP-2103 R0 Form 1, ISCO Sampler Inspection and Sample Retrieval Hard Copy Example

(Page 1 of 2)

	amos National Lab - ADI	ESH	Printed	Work Order MSGP-59: MSGP Monitoring St ed 8/10/2017 - 11:25 AM (Duplicate				
Mainten	nance Details							
Procedu	8/10/2019 11:23:00 AM Priority/Type / Inspection TA-3:3  Procedure: MSGP ISCO Sampler Department Utilities and Infrastructure MSGP ISCO Sample Retrieval (EPC-CP-TP-2103 R0 Form 1		-38 Carpent tored Outfa	ter Shor	0			
			Contact	Admin Ja	ne			
Project			Phone:	123-4567	100			
Reason	Example ISCO Sampler Inspecti	on and Sample Retrieval						
Tasks								
#	Description			Meas.	No	N/A	Yes	
70	3.0			Wicas.	NO	TAVES	103	
ON AR		(No. 1) Billion (R. S.)	J = 10		-	-	_	
20		Is sampler ON and functioning properly upo			14	Ja	13	
30	record specific message(s).	Does the sampler display "Sampler Inhibite	d / It No.		-	F	F	
24		Is sampler time delta < 1 min (MST)? If No.	record				-	
40	adjustment	The same seems of this time () in the				П		
		1522] Is sampler ON and functioning proper	rly upon					
50	arrival?				F	Л	_E	
60	ISCO Avalanche Sampler [210J0		n		-	_	-	
00	Disabled"? If No, record specific r	nessage(s). 1522] Is sampler time delta < 1 min (MST)?	If No.			11	15	
70	record adjustment	1022 13 sampler time delta - 1 min (MS1)	0.00		F	F	_	
VA Verbrane C	Calle aking information							
vvater C	Collection information	(but no water collected), describe and record	dataitima					
90	of discharge.	(but no water collected), describe and record	uate/time			. 0	- [5]	
100		implete Bottle Information section.			E	Г	F	
		1522] If water was collected, record current			-		-	
110	refrigerator temperature (C)	A married senson all tracks and and			D	103	_0	
		C01137] If water was collected, record the p	Н					
300		e sample date/time: AVERAGE: MINIMUM;			_	_	_	
120	MAXIMUM			,	11	-1-	T.	
	Retrieval information							
140		? If Yes, record total volume retrieved.		-		· [3]	_ [5]	
400		ned? If Yes, complete the MSGP Visual Asse	ssment		_	_	-	
150	form (EPC-CP-QP-2105)					16	_ E	
ON DE	PARTURE							
170	Are electrical connections secure	?						
180	Record voltage of battery(ies) pov	wering sampler, Voltage(s) >/=11,7V?			П	12		
Equipm	nent specific tasks							
200		Does the sampler pass the ISCO diagnosti	cs test?		F		П	
210	ISCO 3700 Sampler [210C01437]						П	
220		Does sample tubing pass suction test?				Г	П	
230	ISCO 3700 Sampler [210C01437				П	П	П	
240		Has the actuator switch been reset to "Lato	h"?		E		Г	
_		Does ISCO display "Sampler Inhibited" on						

# Inspecting ISCO Stormwater Runoff Samplers & Retrieving Samples

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### Attachment 2: EPC-CP-TP-2103 R0 Form 1, ISCO Sampler Inspection and Sample Retrieval Hard Copy Example (cont.)

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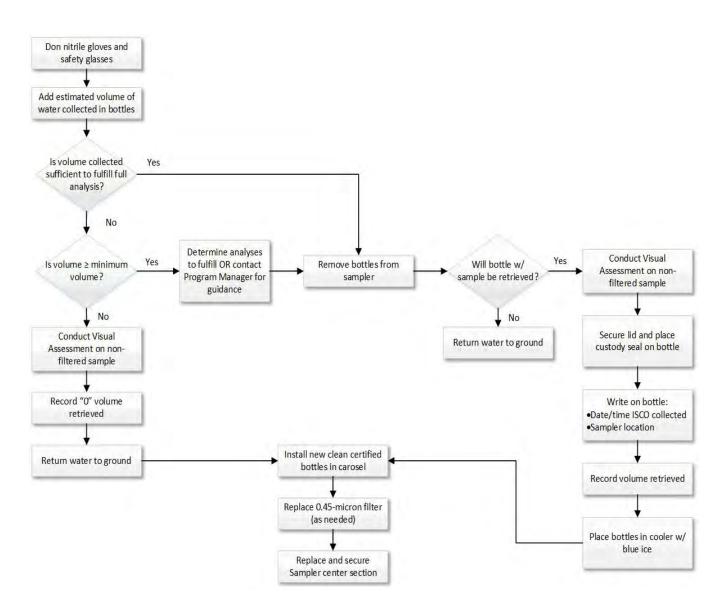
260	ISCO Avalanche Sampler [210J01522] Does the sampler pass the ISCO diagnostics test?			F
270	ISCO Avalanche Sampler [210J01522] Is intake tubing free/clear of debris?			
280	ISCO Avalanche Sampler [210J01522] Does sample tubing pass suction test?			
290	ISCO Avalanche Sampler [210J01522] is sampler on upon departure?			
300	ISCO Avalanche Sampler [210J01522] Has the actuator switch been reset to "Latch"?	- 0		
310	ISCO Avalanche Sampler [210J01522] Does Avalanche display "Program Disabled" on departure?	п	п	
Mainte	nance information			
330	Is any maintenance not described above completed during inspection? If Yes, describe.	Г		
340	Is any follow-on maintenance not described above required? If Yes, describe.		D	I
Bottle messa 360	information: IF bottle collected record bottle type (P or G), collection date & time, volume, ges ISCO 3700 Sampler [210C01437] Bottle #1?	and/or any I	sco	_
370	ISCO 3700 Sampler [210C01437] Bottle #2?		-	-
380	ISCO 3700 Sampler [210C01437] Bottle #3?		-	
390	ISCO 3700 Sampler [210C01437] Bottle #4?		F	-
400	ISCO 3700 Sampler [210C01437] Bottle #5?	- F	-	
410	ISCO 3700 Sampler [210C01437] Bottle #6?	- 0	F	F
420	ISCO 3700 Sampler [210C01437] Bottle #7?		П	
430	ISCO 3700 Sampler [210C01437] Bottle #8?	T		
440	ISCO 3700 Sampler [210C01437] Bottle #9?		-	
450	ISCO 3700 Sampler [210C01437] Bottle #10?		Е	
460	ISCO 3700 Sampler [210C01437] Bottle #11?	D	П	Г
470	ISCO 3700 Sampler [210C01437] Bottle #12?		Г	
480	ISCO Avalanche Sampler [210J01522] Bottle #1?	- 0	F	Г
490	ISCO Avalanche Sampler [210J01522] Bottle #29	П		
500	ISCO Avalanche Sampler [210J01522] Bottle #39			
510	ISCO Avalanche Sampler [210J01522] Bottle #4?			
Compl	Report  eted: 5/30/2019 4:44:00 PM  : Jane Admin			
Kepon	June Admin  5/30/2019 Signature / Name  Date Signature / Name	-6-	Date	
confir	m the information as recorded is true, accurate and complete.			

<b>Inspecting ISCO Stormwater Runoff</b>
Samplers & Retrieving Samples

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# **Attachment 3: Sample Retrieval Flow Diagram**

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# ATTACHMENT 20: EPC-CP-QP-2106, PROCESSING MSGP STORMWATER SAMPLES

EPC-CP-QP-2106	Revision: <b>0</b>	Los Alamos
Effective Date: 10/18/2019	Next Review Date: 10/18/2022	NATIONAL LABORATORY EST.1943

Environment, Safety, Health, Quality, Safeguards, and Security Directorate

Environment Protection and Compliance – Compliance Programs Group

Quality Procedure

# **Processing MSGP Stormwater Samples**

Hazard Grading:	⊠ Low		☐ High/Complex			
Usage Level:	⊠ Referen	ce UET	Mixed: UET Sections:			
Status:	☐ New	Major Revision	Minor Revision			
	Review	w/No Changes	Other: New EPC-CP format an	d numbering system		
Safety Basis:	⊠ N/A	USQ	USI Number:			
		Document Author,	/Subject Matter Expert:			
Name:		Organization:	Signature:	Date:		
Holly L. Wheeler		EPC-CP	Signature on File	10-17-19		
	Derivative Classifier: Unclassified or					
Name:		Organization:	Signature:	Date:		
Steven E. Wolfel		EPC-CP	Signature on File	10-17-19		
Approval Signatures:						
EPC-CP Reviewer:		Organization:	Signature:	Date:		
Terrill W. Lemke		EPC-CP Team Leader	Signature on File	10-17-19		
EPC-CP RLM:		Organization:	Signature:	Date:		
Taunia Van Valkenb	urg	EPC-CP Group Leader	Signature on File	10-18-19		

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Users are responsible for ensuring they work to the latest approved version. To document a required read, Login to <u>UTrain</u>, and go to the Advanced Search.

<b>Processing</b>	<b>MSGP</b>	Stormwater
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, THEN
  - [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

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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 WORK ORDER: MSGP-12345

COLLECTION RETRIEVAL 16:03 DATE/TIME: 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	500 ML POLY	1	ICE	X	NIA	Alu

SAMPLE COMMENTS: NIA

FIELD PARAMETERS:

Sample Time NA HH:MM

Visual Inspection WO# MSGP- 67890

COLLECTED BY Jane Doc (Printed Name) (Signature)	Date/Time 07/03/18 09:25		
RELINQUISHED BY (Printed Name) (Signature)	Date/Time 07/03/18 10:05	(Printed Name) (Signature)  RECEIVED BY  John Smith	07/03/18 10:05
PROCESSED BY John Smith (Printed Name) (Signature)	Date/Time 07/03/18 13:00		
RELINQUISHED BY John Smith (Printed Name) (Signature)	Date/Time の7/04/18 の8:35	RECEIVED BY (Printed Name) See CoC# (Signature) 20(7-1326	Date/Time
RELINQUISHED BY (Printed Name) N/A (Signature)	Date/Time	RECEIVED BY (Printed Name) NAA (Signature)	Date/Time

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# **Attachment 2: Sample Container Labels Example**

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Los Alamos N	National Laboratory
Sample ID: MSGP-17-131786	
Container: 500 ML POLY	1 of 1
Preservative: HNO3 ICE	
Analysis: NPDES-Al-Total Recov	rerable
Data/ 04/01/2017	Time: 16:03

Los Alamos N	ational Laboratory
Sample ID: MSGP-17-131787	
Container: 500 ML POLY	1 of
Preservative: HNO3 ICE	
Analysis: NPDES-Al-Total Recove	rable
Date/ 04/01/2017	Time: 16:03

<b>Processing N</b>	SGP Stormwater	r
Samples		

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# Attachment 3: Chain of Custody/Analysis Request Example

(Page 1 of 1)

LANL SMO Los Alamos NM			Chair	10	f (	Cu	sto	00	ly/	Αı	na	lys	sis	F	Re	que	es	t				2	OC/Lab Request # 017-1326 Page 1 of 1	
Client Contact:	Lab Agreen	nent#:		Site	Nan	ne:	1	Los	Alar	mos	Nati	ional	Lat	oora	tory									
	Project Nur															T	T	T	1			Ra	d Screening Info:	
	Analysis Tun 24 Hour- 7 Days - 14 Days - 21 Days - 28 Days -	Other		12-0									4										b Reporting Limit Method Detection	
Field Sample ID	Sample Date	Sample Time	Sample Matrix	MSGP-Zn										d		1								
MSGP-17-131904	Apr 1 2017	16:03	W	1							- (				4				-					
MSGP-17-132187	Apr 1 2017	16:03	W	1						1		1	Ą	1										
				1	- 1				4	1	1													
									14	6	1													
							4	6	1	1	b.													
			11 = 1					6	1	7							1							
						6	6		6								1			T				
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		-		Н		-											1	1						
-			-	-			2							Н			+	+	+	+				
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			4	_													4	1	-	-		-		_
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Special Instructions:																							4/12/	17
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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

# **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:**

Name:	Organization:	Signature:	Date:
Brian Iacona	EPC-CP	Signature on File	4-27-17
	Derivative Classifier:	Unclassified or DUSA ENVPRO	<u>.</u>
Name:	Derivative Classifier: Organization:	Unclassified or DUSA ENVPRO	Date:

### **Approval Signatures:**

Subject Matter Expert:	Organization:	Signature:	Date:
Brian Iacona	EPC-CP	Signature on File	4-27-17
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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	

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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.				
3	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 chemical exposure (Table 302.4) and for radiological exposure (Appendix B to §302.4). In these cases, the RQ applying to the smallest quantity of material will apply.				
	within 24 hours of the release. This do	radiological dose assessment must also be performed ose assessment should be made by an environmental The on-call individual should contact an EPC health			
	Immediate evaluation – RQ comparison (of a radioactive material release)				
	If the release	Then			
	Is equal to or greater than the RQ	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 as necessary.	new data becomes available. Perform Steps 1 through 4			

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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

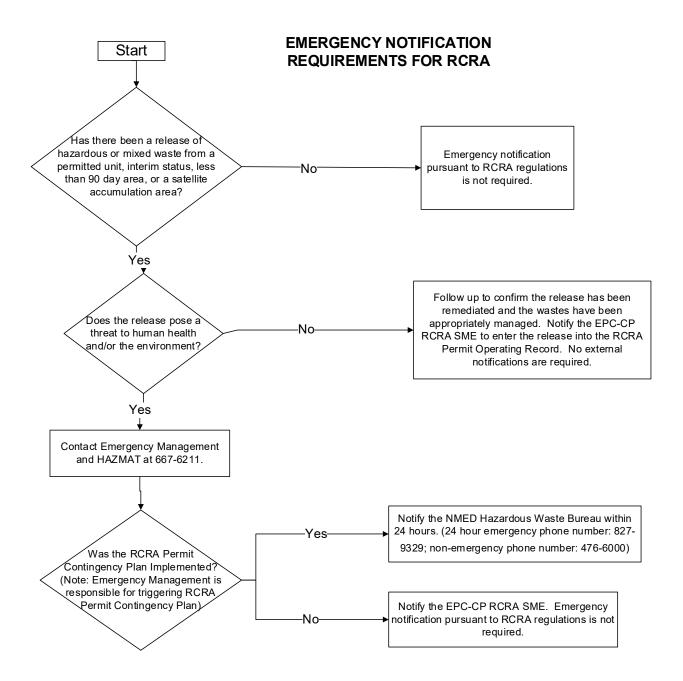
Attachment 1: Emergency Notification Requirements for RCRA

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).

<b>Environmental Reporting Requirement</b>	S
for Releases or Events	

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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.

<b>Environmental</b>	Reporting	Requirements
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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: EPC-CP-QP-1007, SPILL INVESTIGATIONS

EPC-CP-QP-1007	Revision: <b>0</b>	Los Alamos
Effective Date: 06/03/2020	Next Review Date: 06/03/2023	NATIONAL LABORATORY EST. 1943

# Environment, Safety, Health, Quality, Safeguards, and Security Directorate Environment Protection and Compliance – Compliance Programs Group Quality Procedure

# **Spill Investigations**

Hazard Grading:	<b>⊠</b> Low	Moderate	High/Complex	
Usage Level:	Reference	UET	Mixed: UET Sections:	
Status:	New	Major Revision	Minor Revision	
	Review w/N	o Changes	Other:	
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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	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.
EPC-CP-QP-1007, Rev. 0	06/03/2020	Format document into new template and update content. This document was formerly ENV-CP-QP-007 R10.

# **Spill Investigations**

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#### 1.0 INTRODUCTION

All spills and unplanned releases that occur at Los Alamos National Laboratory (LANL) must be evaluated, remediated, and documented to ensure corrective actions are completed and reporting requirements are fulfilled. The investigation of spills and coordination of corrective actions are delegated to the Environmental Protection and Compliance Division's Compliance Programs Group (EPC-CP).

#### 1.1 Purpose

This EPC-CP procedure describes the steps for performing spill investigations throughout LANL.

#### 1.2 Scope

The scope of this procedure is limited to the performance of spill and unplanned release response by EPC-CP personnel and/or authorized subcontractors. Activities include frequent and unscheduled site visits to any area of the Laboratory upon discovery of a spill or unplanned release as support staff for the on-scene Incident Response Commander, deployed environmental staff, or Facility Operations Directorate (FOD) designated facility representative. Support activities include evaluation and documentation of the spill/unplanned release; guidance regarding remediation; and reporting to regulatory agencies.

#### 1.3 Applicability

This procedure applies to all EPC-CP personnel and after hours on-call personnel responsible for conducting spill investigations.

#### 1.4 Authority

The EPC-CP Group Leader is the issuing authority for this document.

#### 2.0 PRECAUTIONS AND LIMITATIONS

A Hazard Analysis was performed for the tasks associated with this procedure. The hazard rating for the activities described in this procedure is **LOW** and does not require an Integrated Work Document.

#### 2.1 Precautions

Precautions apply to abnormal conditions or hazards to personnel or equipment that can be encountered while performing this procedure. The following precautions shall be taken when performing work using this quality technical procedure:

 Personnel shall wear appropriate clothing (e.g., boots, long pants, gloves, etc.) to perform spill investigations in the field. This may also include safety glasses, a hardhat, a safety vest, and/or safety shoes/boots as required by the location of the tank, equipment, and area to be inspected.

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 Work may be paused or discontinued due to conditions that make a location dangerous for worker safety or prevent personnel from safety accessing a site (i.e., flash floods, lightning, wildfires, hail, icy roads, deep snow, extreme temperatures, or hazardous LANL Operations such as firing shots, burns, or security).

#### 2.2 Limitations

Limitations are defined boundaries (i.e., training, hold points) that are NOT to be exceeded while preforming the activities defined in this procedure. The following limitations are applicable to performing work using this technical procedure:

- Perform field activities in accordance with EPC-DO-QP-100, General Field Safety, and/or be escorted by Emergency Management Division – Emergency Operations Group (EMD-EO) or site personnel at all times.
- Spills or unplanned releases that occur on Department of Energy property due to activities
  performed by an organization not associated with Triad National Security, LLC (e.g., Los
  Alamos County, Newport News Nuclear BWXT Los Alamos (N3B), etc.,) are the responsibility
  of that organization. The respective organization is responsible for site remediation,
  completion of corrective actions, and fulfillment any external reporting requirements.
- Some spills or unplanned releases have 15-minute and 24-hour notification requirements.
   Personnel using this procedure must be familiar with the reporting requirements of <u>EPC-CP-QP-0903</u>, <u>Environmental Reporting Requirements for Releases</u>.

#### 3.0 PREREQUISITE ACTIONS

#### 3.1 Planning and Coordination

The response to spills and/or unplanned releases requires frequent and unscheduled site visits to any area of the Laboratory. Certain facilities and Laboratory locations require additional training and have specific access requirements that must be followed. Specific activities may include one or more of the following:

- Site-Specific Training (e.g., burn grounds).
- Coordination with Access Control and/or Security for escort, keys, safety (e.g., explosives areas, burn grounds, between security fences).
- Security Clearance (i.e., TA-3-66, TA-55, TA-16).

Site access for spill/unplanned release response will require that the Spill Investigator maintain multiple site-specific training requirements. It will also require that the Spill Investigator coordinate with the Emergency Operations Center (EOC), designated FOD representative, and/or Deployed Environmental Professional (DEP).

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#### 3.2 Performance Documents

The following documents are required to perform this procedure:

- EPC-CP-QP-1007 Form 1, Unplanned Release Report.
- EPC-CP-QP-1007 Form 2, 7/15 Day Release Report.
- EPC-CP-QP-0903, Environmental Reporting Requirements for Releases.

#### 3.3 Special Tools, Equipment, Parts, and Supplies

Ensure the following are available for spill investigations and field visits:

- Personal protective equipment (PPE) as required by each specific site location (e.g., hardhat, safety vest, safety glasses, safety shoes, etc.)
- 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.
- EPC-CP Spills Pager \*Note: Spills Pager can be configured to forward notifications to a government cell phone and email address.
- External dosimeter (as required by site or facility).
- Field Logbook (maintained to record pertinent information about the spill, i.e., time and date of release, location and source of 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, time, date and description of notifications, etc.).
- Physical or electronic maps (e.g., utility line locations, Solid Waste Management Unit (SWMU) / Area of Concern (AOC) boundaries, land ownership boundaries).

#### 4.0 PERFORMING SPILL INVESTIGATIONS

#### 4.1 Notification of a Spill or Unplanned Release

The EPC-CP personnel that conduct spill investigations ensure the immediate mitigation of spills and timely notification to appropriate regulatory organizations in the event of a spill or unplanned discharge that has or may adversely affect the environment. Spills/unplanned releases are typically reported by a designated FOD representative (i.e., operations, maintenance) or DEP. If the spill/unplanned release is an emergency (i.e., unknown chemical, toxic chemical, flammable chemical, large volume), it will be reported to the EOC at 667-2400 and the EOC will contact the spill investigator using the EPC Spill pager. If the spill/unplanned release is not an emergency, (potable water, small volume, non-toxic), it will be reported via the EPC Spill pager (664-7722) or by phone call from the DEP or other designated FOD representative (i.e., operations, maintenance, security, health and safety. The EPC-CP Spill Program maintains an on-call schedule for after-hours support

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for incidents and unplanned releases. This listing is updated every three months with contact information for trained EPC-CP personnel (see Attachment 1). This schedule is submitted electronically to update the Primary On-Call List available through the Laboratory's EMD-EO Organizations.

#### Spill Investigator/On Call

- [1] Receive notification of a spill or unplanned release from one of the following:
  - Spill Pager (664-7722) or forwarded cell phone.
  - Emergency Operations Center (667-2400).
  - Phone call from the DEP or other designated FOD representative (i.e., operations, maintenance, security, health and safety).
- [2] Document the following information, at a minimum, in the Spill Logbook:
  - Time, Date, and Location of the spill/unplanned release
  - Owner of Spill and Site Contact
  - · Material Spilled
  - Approximate Volume of the Spill/Unplanned Release
  - Source of the Spill
- [3] Request that the EOC identify a safe route to the site/location of the spill or unplanned release.

#### **CAUTION**

Spills or unplanned releases that occur on Department of Energy property from an organization not associated with Triad National Security, LLC (e.g., Los Alamos County, N3B etc.) are the responsibility of that organization. The respective organization is responsible for site remediation, corrective actions, and external reporting requirements.

- [4] If the owner of the spill is not associated with Triad National Security, LLC, refer the caller to one of the following, as appropriate:
  - Los Alamos County (LAC) Department of Public Utilities at 662-8333 for releases discovered during normal work hours from LAC owned equipment or infrastructure.
  - After Hours LAC Call Police Dispatch at 662-8222 for releases outside of normal work hours from LAC owned equipment or infrastructure.
  - N3B Operations Center at 551-2954 for releases from N3B owned equipment or infrastructure.
- [5] If the owner of the spill is associated with Triad National Security, LLC, prepare for a site visit as follows:

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- [a] Based upon location of the spill/unplanned release, determine what access requirements are applicable (i.e., Q/L Clearance, Site Specific Training) (see Section 3.1).
- [b] Based upon the location and material spilled, determine the appropriate PPE for the site visit (e.g., boots, safety glasses, long pants/shirt, hardhat, safety vest).
- [6] If the spill is de Minimis (low volume); of a known material (potable water, sanitary waste; and personnel have the appropriate knowledge/training, instruct the following:
  - [a] The delegated FOD representative, DEP and/or Waste Management Coordinator (WMC) may remediate the spill without the Spill Investigator being present.
  - [b] The designated FOD representative, DEP, and/or WMC must complete an Unplanned Release Report (Attachment 2) and submit a copy of the report to the Spill Investigator for recordkeeping.

#### 4.2 Emergency Spill/Unplanned Release - Responding with EMD-EO

The Spill Investigator will respond to emergency spills/unplanned releases when notified. Emergency spills/unplanned releases typically include unknown materials leaking from bins, drums, and containers, hazardous materials (i.e., acid, caustic, fuel), or large volumes of petroleum products (i.e., leaking tanks, tanker truck accidents). Emergency spills/unplanned releases are managed by the EOC. The following provides the steps a Spill Investigator will follow when responding to support the EOC for an emergency spill/unplanned release.

#### Spill Investigator/On Call Spill Responder

- [1] Travel to the location of the spill or unplanned release.
- [2] Report to designated Incident Response Coordinator and receive site-specific safety and security briefing.
- [3] Assess and evaluate nature and extent of the release.
- [4] Provide support and guidance to EMD-DO, Hazmat, and Facility personnel on release mitigation measures and requirements. Examples of the types of support and guidance are:
  - [a] Provide the final inspection of the site to ensure that corrective actions were adequate and are complete.
  - [b] Recommend corrective actions.
  - [c] Inspect the site to ensure that the extent of the spill/unplanned release is adequately defined.

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- [d] Recommend how to stabilize the site for further remediation (i.e., secure the site from storm water).
- [e] Identify watercourse boundaries near the spill/unplanned release.
- [f] Determine if samples need to be collected.
- [g] Recommend sample types and analysis.
- [h] Recommend sample locations and the number of samples to determine extent of condition.
- If sample collection is required, have the DEP/WMC contact the waste management organization and 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.
- [6] Document the following information regarding the spill or unplanned release in the Logbook:
  - Timeline of spill/unplanned release response as it occurs.
  - Nature and extent of the spill/unplanned release (i.e., inside a building, on asphalt, nearest watercourse/drainage area, proximity to SWMU/AOC and/or outfalls).
  - Steps taken to contain the spill.
  - Samples collected, if any. Include number, type, location, and analysis.
  - Spill and control equipment used to remediate the spill.
  - Corrective actions completed and the amount of waste material.

#### 4.2 Non-Emergency Spill or Unplanned Release

The Spill Investigator will respond to non-emergency spills/unplanned releases when notified. Non-emergency spills/unplanned releases typically include potable water leaks; sanitary wastewater leaks, spills, overflows; and small volumes of known chemicals (e.g., hydraulic fluid leaks, vehicle oil leaks). Non-Emergency Spills/Unplanned Releases are typically handled by a designated FOD representative (i.e., operations, maintenance), DEP, or WMC assigned to the area. The following provides the steps a Spill Investigator will follow when responding a non-emergency spill/unplanned release.

#### Spill Investigator/On Call

- [1] Coordinate with the FOD designee and/or waste management coordinator to visit the location of the spill/unplanned release.
- [2] Travel to the location of the spill/unplanned release.

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#### CAUTION

The Spill Investigator may respond to the spill or unplanned release and determine whether the containment and remediation is beyond the capability of the designated FOD representative, DEP, and/or WMC to respond. The EOC should be contacted if additional technical expertise or materials are needed to remediate the release.

- [3] Assess and evaluate the nature and extent of the release as follows:
  - [a] If the spill/release is a small volume or known material (e.g., sanitary waste, potable water, small hydraulic leak), proceed to step 4.
  - [b] If the spill/release is an unknown (e.g., leaking fluid from a metal recycling bin, drum, battery, or other container), stop work and notify the EOC at 667-2400.
  - [c] If the spill/release is a hazardous material or large volume of petroleum product (i.e., battery acid, chemical tank, fuel, hydraulic fluid, oil), stop work and notify the EOC at 667-2400.
  - [d] If the spill/release appears to be beyond the capability of the designated FOD representative, DEP, and/or WMC to contain and/or remediate, the Spill Investigator shall stop work and notify the EOC at 667-2400 to obtain the appropriate resources.
- [4] Provide guidance to the FOD designee and/or waste management coordinator regarding the containment and/or cleanup of the release. Examples of the types of guidance provided include the following:
  - [a] Provide the final inspection of the site to ensure that corrective actions were adequate and are complete.
  - [b] Recommend corrective actions.
  - [c] Inspect the site to ensure that the extent of the spill/unplanned release is adequately defined.
  - [d] Recommend how to stabilize the site for further remediation (i.e., secure the site from storm water).
  - [e] Identify watercourse boundaries near the spill/unplanned release.
  - [f] Determine if samples need to be collected.
  - [g] Recommend sample types and analysis.
  - [h] Recommend sample locations and the number of samples to determine extent of condition.
- [5] If sample collection is required, have the DEP/WMC contact WM-SVS and complete a 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.

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- [6] Document the following information regarding the spill or unplanned release in the Logbook:
  - Timeline of spill/unplanned release response as it occurs.
  - Nature and extent of the spill/unplanned release (i.e., inside a building, on asphalt, nearest watercourse/drainage area, proximity to SWMU/AOC and/or outfalls).
  - Steps taken to contain the spill.
  - Samples collected, if any. Include number, type, location, and analysis.
  - Spill and control equipment used to remediate the spill.
  - Corrective actions completed and the amount of waste material.
- [7] Coordinate and document all required follow up corrective actions with the FOD designees, DEP, and/or WMC.
- [8] Determine the applicable internal and external reporting requirements as outlined in Section 4.3.

#### 4.3 Reporting Spills and/or Unplanned Releases

This section describes how to determine whether an unplanned release, spill, or other event needs to be reported under environmental regulations and how to fulfill all immediate reporting requirements (within the first 24-hours).

#### 4.3.1 Immediate Notification

#### Spill Investigator/On Call Spill Responder

- [1] Identify which of the following internal stakeholders that should receive a report of the spill/unplanned release:
  - EPC-CP Group and Division Management
  - Compliance Subject Matter Experts (SME). This includes Resource Conservation and Recovery Act, National Pollution Discharge Elimination System, Storm water, Groundwater, and/or Waste Management compliance personnel that potentially have permit specific reporting requirements.
  - FOD where the spill/unplanned release occurred.
  - Designated FOD Representative (i.e., DEP, Operations, and Maintenance).

#### **CAUTION**

Spills/unplanned releases may have EXTERNAL reporting requirements that must be completed within 15 minutes or 24-hours of discovery based upon EPC-CP-QP-0903, Environmental Reporting Requirements for Releases.

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[2] Identify the verbal and written EXTERNAL reporting requirements in accordance with EPC-CP-QP-0903, Environmental Reporting Requirements for Releases.

#### 4.3.2 Non-Reportable Spills/Unplanned Releases

#### Spill Investigator/On Call Spill Responder

- [1] Notify the internal stakeholders (i.e., EPC-CP, SME, FOD, and designated FOD Representative) by phone and/or email (Attachment 1). Include the following pertinent facts as recorded in the logbook:
  - Date, Time, Location of the release.
  - Quantity and type of material.
  - · Status of corrective actions.
- [2] Document the spill/unplanned release in the spills database.
- [3] Document spills/unplanned releases that are NOT reportable to an external regulatory agency on EPC-CP-QP-1007-Form 1, Unplanned Release Report (Attachment 2).
  - [a] If the Form 1 is completed by a DEP or other designated FOD representative, request a copy of the signed form.
  - [b] Attach completed EPC-CP-QP-1007-Form 1 to the spill database record.
- [4] Submit copies of the accumulated EPC-CP-QP-1007-Form 1's, (annually), to records in accordance with <u>ADESH-AP-006</u>, <u>Records Management</u>.

#### 4.3.3 Reportable Spills/Unplanned Releases

#### Spill Investigator/On Call Spill Responder

- [1] Notify the internal stakeholders (i.e., EPC-CP, SME, FOD, and designated FOD Representative) by phone and/or email (Attachment 1). Include the following pertinent facts as recorded in the logbook:
  - [a] Date, Time, Location of the release.
  - [b] Quantity and type of material.
  - [c] Status of corrective actions.
- [2] Notify National Nuclear Safety Administration (NNSA)/Los Alamos Site Office (LASO).
- [3] Perform the required EXTERNAL verbal notifications to the appropriate regulatory agencies (i.e., New Mexico Environment Department [NMED], Environmental Protection Agency [EPA]) in accordance with <a href="EPC-CP-QP-0903">EPC-CP-QP-0903</a>, Environmental Reporting Requirements for Releases.

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- [4] Document spills/unplanned release on EPC-CP-QP-1007-Form 2, 7/15 Day Release Report (Attachment 3).
  - [a] Ensure that the EPC-CP-QP-1007-Form 2 is reviewed and assigned an LA-UR document release number.
  - [b] Attach the final EPC-CP-QP-1007-Form 2 to the spill database record.
  - [c] Submit the final EPC-CP-QP-1007-Form 2 as an e-mail attachment to the appropriate regulatory agency.
  - [d] Submit a copy of the EPC-CP-QP-1007-Form 2 to the internal stakeholders and NNSA/LASO.
- [5] Document the spill/unplanned release in the spills database.
- [6] Attach completed EPC-CP-QP-1007-Form 2 to the spill data base record.
- [7] Electronically file a copy of the EPC-CP-QP-1007-Form 2 in Spills folder located at ENV(\\dcstorage.lanl.gov):\CP\WQ\WQCC COMP PROG.
- [8] Submit copies of the accumulated EPC-CP-QP-1007-Form 2's, (annually), to records in accordance with ADESH-AP-006, Records Management.

#### 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 in <a href="EPC-CP-PIP-1001">EPC-CP-PIP-1001</a>, New <a href="Mexico Water Quality Control Commission">Mexico Water Quality Control Commission</a> (WQCC) <a href="Program Implementation Plan (PIP)">Program Implementation Plan (PIP)</a>. This will include "self-study" (required reading) for this procedure as assigned and documented in accordance with <a href="ADESH-TPP-301">ADESH Training Program Plan (TPP)</a>.

#### 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 Plan. Records generated by this document will be submitted to the Records Management designated point of contact or document manager for document management. The following records are generated by this procedure.

Record Title	QA Record	Non-QA Record
EPC-CP-QP-1007 Form 1, EPC-CP Unplanned Release Report		
EPC-CP-QP-1007 Form 2, EPC-CP 7/15 Day Release Report	$\boxtimes$	
Correspondence (i.e., E-mail Notifications to LANL Management, DOE, and other EPC-CP permit subject matter experts)		

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Correspondence - E-mail Submittals of 7/15 Day Release Reports to NMED		
Logbook	$\boxtimes$	

#### 7.0 DEFINITIONS AND ACRONYMS

#### 7.1 Definitions

See LANL <u>Definition of Terms</u>.

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.

#### 7.2 Acronyms

See LANL Acronym Master List.

T
Area of Concern
Deployed Environmental Professional
Emergency Management Division -Emergency Operations Group
Emergency Operations Center
Environmental Protection and Compliance Group
Facility Operations Directorate
Los Alamos County
Los Alamos National Laboratory
Los Alamos Site Office (LASO).
Newport News Nuclear BWXT Los Alamos
New Mexico Environment Department
National Nuclear Safety Administration
Program Implementation Plan
Personal Protective Equipment
Solid Waste Management Unit
Training Program Plan
Waste Management Coordinator
Water Quality Control Commission
Subject Matter Expert

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#### 8.0 REFERENCES

ADESH-AP-006, Records Management Plan

ADESH-TPP-301, ADESH Training Program Plan (TPP)

EPC-CP-PIP-1001, New Mexico Water Quality Control Commission (WQCC) Program Implementation Plan

EPC-CP-QP-0903, Environmental Reporting Requirements for Releases

EPC-DO-QP-100, General Field Safety

P217, Controlled Portable Electronic Devices

#### 9.0 ATTACHMENTS

**Attachment 1**: Release Notification Phone List

**Attachment 2:** EPC-CP-QP-1007-Form 1, *Unplanned Release Report* 

**Attachment 3:** EPC-CP-QP-1007-Form 2, 7/15 Day Release Report

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#### **Attachment 1: Release Notification Phone List**

#### **Los Alamos National Laboratory**

(1)	<b>Emergency Operations Support Center</b>	(505) 667-2400
(2)	EPC-ES Group Office	(505) 665-8855
(3)	EPC-CP Group Office	(505) 667-0666
(4)	EPC-DO	(505) 667-2211
(5)	EPC-CP Spills Pager	(505) 664-7722

#### **New Mexico Environment Department**

(1)	NMED Emergency Hotline (24 hours a day)	(505) 827-9329
(2)	NMED Non-Emergency Hotline (Voicemail; 24 hours a day)	1 (866) 428-6535
(3)	NMED Surface Water Quality Bureau	(505) 827-0187
	Jennifer Foote	(505) 827-0596
(4)	NMED Ground Water Quality Bureau	(505) 827-2900
	Gerald (Jake) Knutson	(505) 827-2996
	Steve Pullen	(505) 827-2962
(5)	NMED Hazardous Waste Bureau	(505) 476-6000
	Stephen Connolly	(505) 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)	Nancy Williams	1 (214) 665-7179

#### <u>Los Alamos Fire Department</u> (505) 662-8301

#### **U.S. Department of Energy**

(1) Karen Armijo (505) 665-7314

#### **Newport News Nuclear BWXT Los Alamos (N3B)**

(1) N3B Operations Center (505) 551-2954

#### **New Mexico State Police**

New Mexico State Police (505) 827-9604

#### EPC-CP On-Call Environmental Representative for Release Assessment and Notifications to External Agencies

(1) Terrill Lemke	(505) 665-2397 (Office) (505) 699-0725 (Cell)
(2) Steve Pearson	(505) 667-3005 (Office) (505) 699-3684 (Cell)
(3) Mike Saladen	(505) 665-6085 (Office) (505) 699-1284 (Cell)
(4) Tim Zimmerly	(505) 664-0105 (Office) (505) 699-7621 (Cell)

# **Spill Investigations**

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# Attachment 2: Unplanned Release Report, EPC-CP-QP-1007-Form 1

Did the spill occur inside or outside a building?		)	n (EPC-CP)	s National Laborat ompliance Prograr ned Release Repor	mental C			
Date of Spill/Date Spill Discovered:    Location:		Group:		Telephone:			r:	Form Completed By:
Material Spilled:		☐ Other:		ubcontractor;	□ 5t	TRIAD, LLC	(Specify):	Spill Owner Details (Specif
Material Spilled:   Hydraulic Fluid							pill Discovered:	Date of Spill/Date Spill Disc
Hydraulic Fluid								Location:
Potable Water   Steam Condensate   Gasoline   Ubricants/Oils   Other;			-			-		Material Spilled:
Diese   Lubricants/Oils   Other;		efrigerant Oil	☐ Ref	de activities and a second		-	uid	☐ Hydraulic Fluid
Volume Spilled:   Waste Volume Generated:   Source of Spill:   Potable Water Line   Radiator   Radiator   Sequipment ID:   Fire Suppression System   Condensate Line   Sequipment ID:   Fire Suppression System   Condensate Line   Sequipment ID:   Fire Suppression System   Condensate Line   Sequipment ID:   Sequipment ID:   Fire Suppression System   Condensate Line   Sequipment ID:   Sequipment ID:   Fire Suppression System   Condensate Line   Other:   Describe the spill response in chronological order. Include response personnel, steps taken to contain the spill, and steps/spill used to clean it up. Please indicate if corrective actions have been completed and describe actions taken to prevent spill recurre   Did the spill enter or impact any of the following?   Ploor Drain, if so please indicate affected facility   Watercourse/drainage area, if so please indicate   Watercourse/drainage area, if so please indicate   Solid Waste Management Unit/Area of Concern, if so please   NPDES MSGP Facility   None.   None.   Solid Waste Management Unit/Area of Concern, if so please indicate   Solid Waste Management Unit/Area of Concern, if so please   Solid Waste Management Unit/Area of Concern, if so please indicate   Solid Waste Management Unit/Area of Concern, if so please   Solid Waste Management Unit/Area of Concern, if so please indicate   Solid Waste Management Unit/Area of Concern, if so please indicate   Solid Waste Management Unit/Area of Concern, if so please indicate   Solid Waste Management Unit/Area of Concern, if so please indicate   Solid Waste Management Unit/Area of Concern, if so please indicate   Solid Waste Management Unit/Area of Concern, if so please indicate   Solid Waste Management Unit/Area of Concern, if so please indicate   Solid Waste Management Unit/Area of Concern, if so please indicate   Solid Waste Management Unit/Area of Concern, if so please indicate   Solid Waste Management Unit/Area of Concern, if so please indicate   Solid Waste Management Unit/Area of Concern, if so please indicate   S		asoline	☐ Gas				ter	☐ Potable Water
Source of Spill:		ther;	□ Oth	/Oîls	Lubricants	П		☐ Diesel
Price   Pric				ume Generated:	Waste Vol			/olume Spilled:
Date Corrective Actions Completed:  Did the spill occur inside or outside a building?  Did the spill occur inside or outside a building?  Did the spill occur inside or outside a building?  Did the spill occur on:  Carpeted Floor  Tille  Wooden Floor/Deck  Samples Collected:  Soil Vagetated Area  Wooden Floor/Deck  Carpeted Floor  Tille  Water  Carpeted Floor  Tille  Wooden Floor/Deck  Soil/Vegetated Area  Wooden Floor/Deck  Certification:  Certifying Official:  Organization:  Date Corrective Actions Contain the spill, and steps/spill accur and steps/spill accur and steps/spill accur and steps/spill recurred and describe actions taken to contain the spill recurred and describe actions taken to contain the spill recurred and steps/spill recurred and steps/spill recurred and describe actions taken to contain the spill recurred and steps/spill recurred and steps/spill recurred and describe actions taken to contain the spill recurred and steps/spill recurred and steps/spill recurred and describe actions taken to contain the spill recurred and steps/spill recurred and describe actions taken to contain the spill recurred and steps/spill recurred and describe actions taken to contain the spill recurred and describe actions taken to contain the spill recurred and describe actions taken to contain the spill recurred and describe actions taken to contain the spill recurred and describe actions taken to contain the spill recurred and describe actions taken to contain the spill recurred and describe actions taken to contain the spill recurred and describe actions taken to contain the spill recurred and describe actions taken to prevent spill recurred and descr		adiator	☐ Rad	le Water Line	☐ Potab			Source of Spill:
Date Corrective Actions Completed: Did the spill response in chronological order. Include response personnel, steps taken to contain the spill, and steps/spill used to clean it up. Please indicate if corrective actions have been completed and describe actions taken to prevent spill recurre  Date Corrective Actions Completed: Did the spill enter or impact any of the following? (Check as many as apply)  RCRA Treatment Storage Disposal Facility  RCRA Satellite Accumulation Area RCRA <90 Day Storage Area NPDES MSGP Facility  Did the spill occur inside or outside a building? Inside Did the spill occur on: Check as many as apply)  Carpeted Floor Floor/Deck Samples Collected: Soil (Famples were collected, indicate analytic order) Water Other: Corrification Certifying Official: Organization: Date Corrigication: Corrected organization: Date Corrigication: Corrective Actions taken to contain the spill and steps/spill and steps/spill recurred. Floor Drain, if so please indicate affected facility Water Countries are please indicate affected facility Water Corrigication: Date Corrective Actions to contain the spill recurred indicate analytic organization: Date Corrections to contain the spill recurred indicate analytic organization: Date Corrections to contain the spill recurred indicate analytic organization: Date Corrections to contain the spill recurred indicate analytic organization: Date Corrections to contain the spill steps organization or this form. The information, to my knowledge, is true, accurate organization: Corrections to contain the spill recurred indicate analytic organization: Date Corrections to contain the spill recurred indicate analytic organization: Date Corrections to contain the spill recurred indicate analytic organization: Date Corrections to contain the spill recurred indicate affected facility.  Corrections to contain the spill recurred indicate affected facility.  Correction to contain the spill recurred indicate affected facility.  Correction to contain the spill recurred indicate affected fac		ondensate Line	☐ Cor	appression System	☐ Fire Si			Vehicle ID:
Date Corrective Actions Completed: Did the spill enter or impact any of the following? Check as many as apply)    RCRA Treatment Storage Disposal Facility   Watercourse/drainage area, if so please indicate affected facility   Watercourse/drainage area, if so please indicate   Solid Waste Management Unit/Area of Concern, if so please   NPDES MSGP Facility   None   None   Solid Waste Management Unit/Area of Concern, if so please   Solid Waste Management Unit/Area of Concern, if so please   NPDES MSGP Facility   None   Solid Waste Management Unit/Area of Concern, if so please   Indicate   Solid Waste Management Unit/Area of Concern, if so please   Indicate   I		ther:	□ Oth	ank	☐ Fuel T			quipment ID:
RCRA Satellite Accumulation Area RCRA <90 Day Storage Area NPDES MSGP Facility  Did the spill occur inside or outside a building? Inside Corpeted Floor Title Wooden Floor/Deck None  Samples Collected: None None Samples Collected: None None Samples Collected: None None Soil None Soil None Soil None Soil None None Soil None So							impact any of the f ply)	Did the spill enter or impact a (Check as many as apply)
Did the spill occur inside or outside a building?	Solid Waste Management Unit/Area of Concern, if so please indicate				acinty			
Did the spill occur inside or outside a building?					277767			
Did the spill occur on:   Concrete				□ None				
Check as many as apply)  Carpeted Floor  Tile  Wooden Floor/Deck  Other:  Samples Collected:  None  Air  Water  Other:  Certification  Certifying Official:  Certification:  Certification:  Certification:  Certification:				☐ Outside	☐ Inside	building?	inside or outside	Did the spill occur inside o
Tile   Soil/Vegetated Area   Other:		A	Asphalt			Concrete		
Wooden Floor/Deck  Other:  Samples Collected:  Soil  If samples were collected, indicate analytic  Air Water  Other:  Certification  Certifying Official:  Organization:  Date  Certification:  Certification:  Organization:  Organization:  Organization:  Organization:  Organization:		ocky Area	Graveled/Roc		loor	Carpeted F	apply)	Check as many as apply)
Samples Collected: Soil If samples were collected, indicate analytic None Air Water Other:  Certification  certify that I am knowledgeable about the information on this form. The information, to my knowledge, is true, accuration of Certifying Official: Organization:  Certification:  Certification:		ted Area	Soil/Vegetate			Tile		
None Air Water Other: Certification Certify that I am knowledgeable about the information on this form. The information, to my knowledge, is true, accuration of Certifying Official: Certification: Certification:			Other:		loor/Deck	Wooden Fl		
None Air Water Other: Certification Certify that I am knowledgeable about the information on this form. The information, to my knowledge, is true, accuration of Certifying Official:  Organization: Certification:  Ompleted by EPC-CP Personnel	cal suite;	ollected, indicate analytical su	mples were coll	Ifsa		Soil	П	Samples Collected:
Water Other:								□ None
certify that I am knowledgeable about the information on this form. The information, to my knowledge, is true, accuration of Certifying Official:  Organization:  Organization:  Ompleted by EPC-CP Personnel								□ Water
Name of Certifying Official: Organization: Date Certification:  Ompleted by EPC-CP Personnel								Certification
Certification:  ompleted by EPC-CP Personnel	rate, and complete	owledge, is true, accurate,	on, to my know	form. The information	ation on this	the informa	owledgeable abou	certify that I am knowledge
ompleted by EPC-CP Personnel	e;	Date:		Organization:			fficial:	Name of Certifying Official:
The state of the s								Certification:
Anto Described Constitution Control Ameliana	Non-Reportable	□ N					P Personnel	ompleted by EPC-CP Perso
Date Received: Severity Index: Causal Analysis:	Reportable	□ Re	alysis:	Causal An	ci.	verity Index	S	Date Received:

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# Attachment 3: 7/15 Day Release Report, EPC-CP-QP-1007-Form 2

	DISCHAR	GE NOTIFIC	CATION	Calendar Year 2020
	Permit Number:	NM0028355		
NPDES or Operational Spill/Relea ER Spill/Relea Other Spill/Relea	ase 🗌 —Indicat	e with "X" in appropri	ate box.	Release ID Number:
Responsible Facility/User Group:				
Contact Person:			Pager #:	
Phone #:			cell Phone #:	
Release/Discharge Location:				
TA:				
Building:				
If the release/discharge is associated w Unit (SWMU), indicate the site/unit numb  NPDES Outfall:  PRS:  SV  Indicate with "X" in appropriate box(es;  Relationship of the Discharge to a SWM	ber and its relation VMU: PRS			
Discharge Occurred: Date & Time	Discharge Discovered:	Date & Time	Discharge Stopped:	Date & Time
Cleanup Started:	Date & Time	Cleanup Completed:	Date & Tim	ne

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Release/Discharge Mitigation Method:					
Weather Conditions:					
-					
Duration of Relea Discharge, in HOU		Est. Volume released gallo		Est. Volume Recovered, in gallons.	
Corrective Actions Tak	en (ie, type of BMP	s, etc):			
Nearest Watercourse (	Canyon Name)				
				ea affected, presence of	
release/discharge now	in the watercourse	, and the media the relea	ase/discharge w	vas detected in:	
Depth to Groundwater,	in FT, if known:				
Distance to Nearest Dri	nking Water Well, i	n FT, if known:		Well ID#	
	24 UOUD D	ELEASE / DISCUA	DOE NOTIE	CATIONS	
	24-HOUR RI Contact Person	ELEASE / DISCHA Phone	RGE NOTIFI	Date & Time (or Comment)	
EPA:					
EPA: [					
NMED/SWQB:					
NMED/SWQB:					
NMED/SWQB: NMED/GWQB: NMED/HRMB:					
NMED/SWQB: NMED/GWQB: NMED/HRMB: NMED/DOE-OB:					
NMED/SWQB: NMED/GWQB: NMED/HRMB: NMED/DOE-OB: EPC-CP:					
NMED/SWQB: NMED/GWQB: NMED/HRMB: NMED/DOE-OB: EPC-CP: DOE:					
NMED/SWQB: [  NMED/GWQB: [  NMED/HRMB: [  NMED/DOE-OB: [  EPC-CP: [  DOE: [  OTHER: [					
NMED/SWQB: NMED/GWQB: NMED/HRMB: NMED/DOE-OB: DOE: OTHER:					

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7 DAY RELEASE / DISCHARGE ACTIONS						
7 Day Notice 7 Day Notice Date Mark "X" when done.	e: 7 Day Notice By:					
Comments:						
15 DAY RE	LEASE / DISCHARGE ACTIONS					
15 day Follow-up Due:	15-day Follow-Up By:					
Comments:						
NMED 30 DAY APPROVAL / DISAPPROVAL						
NMED 30 Day Response Date:						
Comments:						

Peter Maggiore, Acting Assistant Manager National Security Missions Los Alamos Field Office 3747 West Jemez Road MS-A316 Los Alamos, New Mexico 87544 (505) 606-0397 Jennifer Payne, EPC Division Director Triad National Security, LLC. Los Alamos National Laboratory P.O. Box 1663, MS K404 Los Alamos, New Mexico 87544 (505) 667-2211

# 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:	
	I	Document Author	/Subject Matter Expert:	
Name:		Organization:	Signature:	Date:
Holly L. Wheeler		EPC-CP	Signature on File	1-6-2020
	Derivativ	e Classifier: 🛛 l	Jnclassified or	
Name:		Organization:	Signature:	Date:
Steven E. Wolfel		EPC-CP	Signature on File	1-6-2020
		Approva	al 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

This copy is uncontrolled.

Users are responsible for ensuring they work to the latest approved version. To document a required read, Login to <u>UTrain</u>, and go to the Advanced Search.

# 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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	3.2	Preparing the SWPPP	
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			_

MSGP Stormwater Pollution
<b>Prevention Plan Preparation and</b>
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;

MSGP Stormwater Pollution	
<b>Prevention Plan Preparation and</b>	
Maintenance	

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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/XXX

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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 Power a	nd Steam P	lant)
Street: P.O. Box 1663	-		
City: Los Alamos	Sta	te: NM	ZIP Code: 87545
County: Los Alamos			
NPDES ID (i.e., permit tracking number): NMR	050013		
Primary Industrial Activity SIC code, and Secto SIC <mark>XXXX, Sector X, Subsector XX</mark>	r and Subsecto	r (2015 MS	GP, Appendix D and Part 8):
Estimated area of industrial activity at site exp	osed to storm	water: XX a	cres
Discharge Information			
Name(s) of surface water(s)/segment that reco	eives stormwat	ter from yo	ur facility: Sandia Canyon
Sigma Canyon to NPDES outfall 001), Note: Fo	or Roads and G	rounds also	add "and Mortandad Canyon
within LANL)". Note: For Asphalt Batch Plant a "Mortandad Canyon (within LANL)."	alone, delete S	andia Cany	on information and insert only
Does this facility discharge industrial stormwa	ter directly into	any segme	ent of an "impaired water"
see definition in 2015 MSGP, Appendix A)?	⊠Yes	No	

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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)?

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 documen 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: Name Title, Organization	The MSGP Program Lead is responsible for managing and administering the MSGP Program for all industrial facilities operated by Triad within Los Alamos National Laboratory. The 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):  Name Title, Organization	Responsible for day-to-day operations at the facility. Assists the DEP and EPC with inspections; spill reporting; implementing, installing and maintaining storm water controls (also known as 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 Location	Outfall(s) Affected	

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 SWPP. 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-Q22, 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-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 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 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

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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

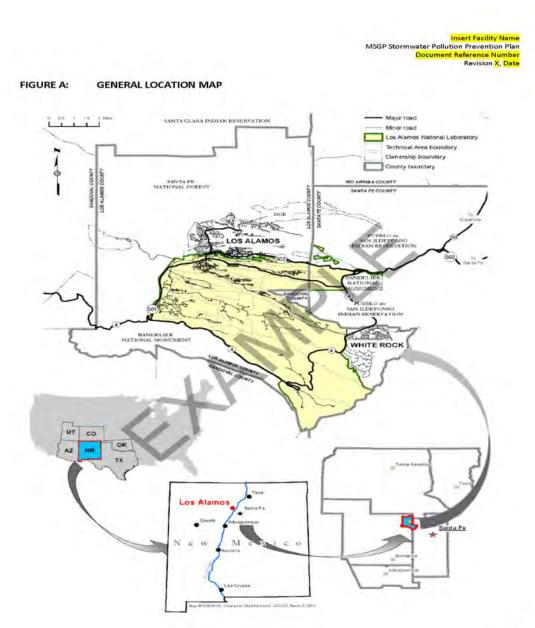
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage 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	10.7	Date	
(Insert Printed Name)			
(Insert Title)	101		

MSGP Stormwater Pollution
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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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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 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	



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ATTACHMENT 3: CERTIFICATION OF NO UNAUTHORIZED STORMWATER DISCHARGES

Insert the appropriate attachment.



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ATTACHMENT 4:

**DULY AUTHORIZED SIGNATORY MEMORANDUM** 

Insert the appropriate attachment.



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ATTACHMENT 5: DISCHARGE MONITORING REPORTS

Insert the discharge monitoring reports.



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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

Date	Control Measure or Equipment Description (include location where appropriate)	Action Taken/Comments	Action Taken By (printed name & Z no.
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		012	
	1	Y	
	4		

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ATTACHMENT 11: TRAINING DOCUMENTATION

Insert the appropriate documentation.



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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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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>Q47, INSPECTING STORMWATER RUNOFF SAMPLERS AND RETRIEVING SAMPLES FOR THE MSGP</mark>



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ATTACHMENT 20: EPC-CP-QP-21

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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SWPPP Title

REQUIREMENT	YES/NO	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?		
Contents of the SWPPP		
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?		
Identify a description of the nature of the industrial activities at the site		
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		
<ul> <li>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)</li> </ul>		
Locations of all stormwater conveyances including ditches, pipes, and swales		
• Locations of potential pollutant sources associated with each industrial activity (see Part 5.2.3.2) that could be exposed to rainfall or snowmelt and could be discharged from the site.		
Locations where significant spills or leaks have occurred (see Part 5.2.3.3)		
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 Parts 3.2.3, 5.2.5.3, and 6.1.1)		
If applicable, location of the MS4 and where your stormwater discharges to it.     NOTE: Although LANL does not currently have an MS4, EPA has published a draft permit.		
Areas of designated critical habitat for endangered or threatened species		
Locations of the following activities where such activities are exposed to precipitation:		

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REQUIREMENT	YES/NO	NOTES
- Fueling station(s)		
- Vehicle and equipment maintenance and/or cleaning area		
- Loading/unloading areas		
- Locations used for the treatment, storage, or disposal of wastes		
- Liquid storage tanks		
- Processing and storage areas		
<ul> <li>Immediate access roads used by carriers of raw materials, manufactured products, waste material, or by-products used or created by the site</li> </ul>		
- Transfer areas for substances in bulk	de .	
- Machinery	4	
<ul> <li>Locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants</li> </ul>		
Potential Pollutant Sources		
Are areas described in the SWPPP where industrial material or activities are exposed to stormwater or from which allowable non-stormwater discharges originate?  NOTE 1: Industrial material or activities include material handling equipment or activities; industrial machinery; raw material; industrial production and processes; and intermediate products; by-products; final products, and waste products. Material handling activities include the storage, loading and unloading, transportation, disposal or conveyance of any raw material, intermediate product, final product or waste product.		
Are all pollutants or pollutant constituents (e.g., zinc, sulfuric acid, cleaning solvents, motor oil, diesel, gasoline, brake fluid, etc.) associated with each activity identified?  NOTE 2: The list must include all pollutants/materials that have been handled, treated, stored, or disposed and that have been exposed to stormwater in the three years prior to the date the SWPPP is prepared or amended.		
Are areas where <b>potential</b> spills and leaks could occur that could contribute pollutants to stormwater discharges and the corresponding outfall(s) that would be affected by such spills and leaks identified in the SWPPP?		
Are all significant spills and leaks of oil or toxic or hazardous substances identified that actually occurred at exposed areas, or that drained to a stormwater conveyance, in the three years prior to the date the SWPPP was prepared or amended?		
Has an evaluation for the presence of unauthorized non-stormwater discharges (see Part 1.1.3) been done and does it include the following information?		
Date of the evaluation		
A description of the evaluation criteria used		
A list of the outfall or onsite drainages points that were directly observed during the evaluation		

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REQUIREMENT	YES/NO	NOTES
<ul> <li>The action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), or documentation that a floor drain was sealed, re-routed to sanitary, or an NPDES permit application was submitted for an unauthorized cooling water discharge.</li> </ul>		
Is there documentation of the location of any salt storage piles used for deicing or other commercial or industrial purposes?		
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.		
Control Measures to Meet Effluent Limits		
Does the SWPPP indicate whether the following control measure selection and design criteria were considered?		
Preventing stormwater from coming into contact with polluting materials is generally more effective, and less costly, than trying to remove pollutants from stormwater		
<ul> <li>Using control measures in combination which may be more effective than using control measures in isolation for minimizing pollutants in stormwater discharge</li> </ul>	4	
<ul> <li>Assessing the type and quantity of pollutants, including their potential to impact receiving water quality, is critical to designing effective control measures that will achieve the limits in this permit</li> </ul>		
<ul> <li>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 taken to avoid ground water contamination</li> </ul>		
<ul> <li>Attenuating flow using open vegetated swales and natural depressions can reduce in-stream impacts of erosive flows</li> </ul>		
<ul> <li>Conserving and/or restoring riparian buffers will help protect streams from stormwater runoff and improve water quality</li> </ul>		
<ul> <li>Using treatment interceptors (e.g., swirl separators and sand filters) may be appropriate in some instances to minimize the discharge of pollutants.</li> </ul>		
Does the SWPPP indicate how the control measure addresses the potential pollutant sources?		
Are the selection and design considerations for control measures to meet the following non-numeric technology-based effluent limits (see Part 2,1,2) identified in the SWPPP?		
<ul> <li>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 inside or protecting them with storm resistant coverings.</li> </ul>		
<ul> <li>Use grading, berming or curbing to prevent runoff of contaminated flows and divert run-on away from these areas;</li> </ul>		

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REQUIREMENT	YES/NO	NOTES
- Locate materials, equipment, and activities so that potential leaks and spills are contained or able		
to be contained or diverted before discharge;		
<ul> <li>Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants;</li> </ul>		
- Store leaky vehicles and equipment indoors or, if stored outdoors, use drip pans and absorbents;		
- Use spill overflow protection equipment;		
<ul> <li>Perform all vehicle and/or equipment cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and</li> </ul>		
<ul> <li>Drain fluids from equipment and vehicles that will be decommissioned, and, for any equipment and vehicles that will remain unused for extended periods of time, inspect at least monthly for leaks.</li> </ul>		
• Good housekeeping (all areas where potential pollutants are exposed to stormwater must be kept clean).		
<ul> <li>Sweep or vacuum at regular intervals or wash down the area and collect and/or treat and properly dispose of the wash down water.</li> </ul>		
- Store materials in appropriate containers.		
<ul> <li>Keep all dumpster lids closed when not in use. For dumpsters and roll off boxes that do not have lids and could leak, ensure that discharges have a control (e.g., secondary containment). Part 1.1.3 of the permit does not authorize dry weather discharges from dumpsters or roll off boxes.*</li> </ul>		
* You may include extra information, or you may just "cut-and-paste" the effluent limits verbatim into the SWPPP w/out providing additional documentation.		
<ul> <li>Minimize the potential for waste, garbage, and floatable debris to be discharged by keeping exposed areas free of such materials.</li> </ul>		
<ul> <li>Maintenance (All industrial equipment, systems and control measures must be maintained in effective operating condition in order to minimize pollutant discharges).</li> </ul>		
Perform inspections and preventive maintenance of stormwater drainage, source controls, treatment systems, and plant equipment and systems that could fail and result in contamination of stormwater.		
<ul> <li>Diligently maintain non-structural control measures (e.g., keep spill response supplies available, and personnel appropriately trained).</li> </ul>		
<ul> <li>Inspect and maintain baghouses at least quarterly to prevent the escape of dust from the system and immediately removing any accumulated dust at the base of the exterior baghouse.*</li> </ul>		
<ul> <li>Cleaning catch basins when the depth of debris reached two thirds (2/3) of the sump depth and keeping the debris surface at least six inches below the lowest outlet pipe.*</li> </ul>		
Does the SWPPP contain language indicating immediate action must be taken to minimize pollutant discharges if control measures need routine maintenance?		
Is there language in the SWPPP indicating in instances where control measures need repair or replacement that the facility (or associated representatives thereof) must immediately take all		

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REQUIREMENT	YES/NO	NOTES
reasonable steps (see Part 4.3.1 for definition) to prevent or minimize the discharge of pollutants until the final repair or replacement is implemented, including cleaning up any contaminated surfaces so 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) of 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?		
<ul> <li>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.</li> </ul>	1	
<ul> <li>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 spills or leaks occur:*</li> </ul>		
<ul> <li>Implement procedures for material storage and handling including use of secondary containment and barriers between material storage and traffic areas.</li> </ul>		
<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>		
<ul> <li>Keep spill kits on-site, located near areas where spills may occur or where a rapid response can be made</li> </ul>		
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.		
- In the event of a spill, does the SWPPP indicate where the contact information is so that it is readily accessible and available?		
Erosion and Sediment Controls		
- Does the SWPPP identify how exposed soils will be stabilized to minimize pollutant discharges?		
<ul> <li>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 points?</li> </ul>		
<ul> <li>Does the SWPPP identify structural and non-structural control measure to minimize the discharge of sediment?</li> </ul>		

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# Attachment 2: MSGP SWPPP Review Guidance Checklist Example (cont.) (Page 6 of 11)

REQUIREMENT	YES/NO	NOTES
- If polymers and/or other chemical treatments are used for dust control or stabilization, does the		
SWPPP must identify the polymers and/or chemicals used and the purpose?		
Management of Runoff - Does the SWPPP identify how stormwater runoff is diverted, infiltrated,		
reused, contained, or otherwise reduced to minimize pollutants in the discharge?		
• Salt Storage Piles or Piles Containing Salt - Does the SWPPP identify how salt piles are enclosed or covered?		
<ul> <li>Are controls in place to minimize exposure to stormwater resulting from adding to or removing materials from the salt pile?</li> </ul>		
<ul> <li>Non-Stormwater Discharges - Does the SWPPP indicate that personnel will evaluate the site for non-stormwater discharges not explicitly authorized in Part 1.1.3 or covered by another NPDES permit and eliminate the discharge?)</li> </ul>	/	
<ul> <li>Dust Generation and Vehicle Tracking of Industrial Materials - Does the SWPPP indicate dust generation and off-site tracking of raw, final, or waste materials must be minimized in order to minimize pollutant discharges?)</li> </ul>		
Control Measures to Meet Numeric Effluent Limitations Guidelines-Based Limits (see Part 2.1.3 and Pa	rt 8)	
Are effluent limitations identified for the Sector D facility (Asphalt Paving) (see Part 8.D.4)?		
Are effluent limitations identified for the Sector A facility (Timber Products) (see Part 8.A.7)?		
Control Measures to Meet Water Quality Based Effluent Limits (see Part 2.2 and Part 9.6.2)		
Are the benchmark values (i.e., the Lowest New Mexico Water Quality Standard) listed in MSGP		
Section 9.6.2.1 identified in the SWPPP?		
Schedules and Procedures - Control Measures		
Does the SWPPP contain a schedule or convention used for determining when pickup or disposal of waste materials occurs?		
Are preventative maintenance procedures (including regular inspections, testing, maintenance and repair) for all control measures included in the SWPPP to avoid situations that may result in leaks, spills, and other releases?		
Are backup practices in place should a runoff event occur while a control measure is off line?		
s there a schedule or frequency for maintaining all control measures?		
Are procedures included in the SWPPP for preventing and responding to spills and leaks, including notification procedures?		
Are control measures for material handling and storage identified?		
Are clean-up equipment, procedures and spill logs (i.e., reportable and non-reportable spill reports and		
he MSGP Corrective Action Reporting database) identified?		
chedules and Procedures - Employee Training		
Are the following employees identified as requiring training?		

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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	
<ul> <li>Personnel who are responsible for the design, installation, maintenance and/or repair of controls (including pollution prevention measures)</li> </ul>			
<ul> <li>Personnel responsible for the storage and handling of chemicals and materials that could become contaminants in stormwater discharges</li> </ul>			
<ul> <li>Personnel who are responsible for conducting and documenting monitoring and inspections</li> </ul>	/		
<ul> <li>Personnel who are responsible for taking and documenting corrective actions.</li> </ul>			
Are the following identified as elements of required training?			
An overview of what is in the SWPPP			
Spill response procedures, good housekeeping, maintenance requirements, and material management practices	1		
The location of all controls on the site required by this permit and how they are to be maintained	1		
The proper procedures to follow with respect to the permit's pollution prevention requirements			
When and how to conduct inspections, record applicable findings, and take corrective actions	-		
Are the following elements of the training plan documented in the SWPPP?			
Content of the training			
Frequency/schedule of training			
Are records of completed training kept in the SWPPP?			
Schedules and Procedures - Inspections and Assessments			
Is the procedure identified for conducting routine facility inspections?			
Is the procedure identified for conducting visual assessments?			
For each type of inspection performed (i.e., routine inspection and visual assessments) does the SWPPP identify the person (s) or positions of person(s) responsible for the inspection?			
Does the SWPPP contain an alternative schedule for conducting visual assessments in climates with irregular stormwater runoff discharges (see Part 3.2.3)?			
Are specific items to be covered by the inspection, including schedules for specific outfalls identified in the SWPPP?			
Is the facility claiming an exception as an inactive and unstaffed site? If yes, the facility must include 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. That is, the SWPPP must contain a signed certification indicating that there are no industrial materials or activities exposed to precipitation at the site and the NOI must be modified and re-certified.			
Schedules and Procedures - Monitoring			
Does the SWPPP contain documentation of procedures used to conduct benchmark, effluent limitations guidelines and impaired waters monitoring?			
Are locations where samples are collected, including any determination that two or more outfalls are substantially identical, in the SWPPPP?			
Are parameters for sampling and the frequency of sampling for each parameter listed?			

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Attachment 2: MSGP SWPPP Review Guidance Checklist Example (cont.) (Page 8 of 11)

REQUIREMENT	YES/NO	NOTES
Does the SWPPP contain schedules for monitoring at the facility, including a schedule for alternate		
monitoring periods for climates with irregular stormwater runoff (see Part 6.1.6)?		
Are numeric control values (benchmark, effluent limitations guidelines, water quality standards)		
applicable to discharges from each outfall identified?		
Does the SWPPP list procedures for gathering storm event data (see Part 6.1)?		
Schedules and Procedures - Substantially Identical Outfalls (SIOs)		(
Does the SWPPP contain the following relative to SIOs?		
Location of each of the substantially identical outfalls		
Description of the general industrial activities conducted in the drainage area of each outfall	0	
Description of the control measures implemented in the drainage area of each outfall	- 4	
<ul> <li>Description of the exposed material located in the drainage area of each outfall that are likely to be significant contributors of pollutants to stormwater discharges</li> </ul>		
• An estimate of the runoff coefficient of the drainage areas (low = under 40%, medium = 40% to 65%, high = above 65%		
Justification as to why the outfalls are expected to discharge substantially identical effluents		=
Do Substantially Identical Outfalls identified on the SWPPP map match those identified in MDMRs?		
Is there language indicating quarterly visual assessments of substantially identical outfalls will be performed on a rotating basis throughout the permit term?		
Is there language indicating quarterly visual assessment of the discharge at one SIO will also apply to the other SIOs?		
Corrective Action Documentation - If an event triggering corrective action is associated with an SIO, did the review of the need for action encompass all related substantially identical outfalls?		
Documentation		
Does the SWPPP contain the following up-to-date and complete inspection, monitoring, and certification records?		
<ul> <li>Copy of NOI submitted to EPA along with any correspondence exchanged between the facility and EPA specific to coverage under this permit.</li> </ul>		
Copy of the acknowledgement you receive from the EPA assigning your NPDES ID.		
Copy of the MSGP Permit (an electronic copy easily available to SWPPP personnel is also acceptable).		
Documentation of maintenance and repairs of control measures, including the date(s) of regular maintenance, date(s) of discovery of areas in need of repair/replacement, and for repairs, date(s) that the control measure(s) returned to full function, and the justification for any extended maintenance/repair schedules (See Part 2.1.2.3).		
<ul> <li>All inspection reports, including the Routine Facility Inspection Reports (see Part 3.1.2) and Quarterly Visual Assessment Reports (see Part 3.2.2).</li> </ul>		

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# Attachment 2: MSGP SWPPP Review Guidance Checklist Example (cont.) $(\mathsf{Page}\ 9\ \mathsf{of}\ 11)$

REQUIREMENT	YES/NO	NOTES
<ul> <li>Description of any deviations from the schedule for visual assessments and/or monitoring, and the reason for the deviations (e.g., adverse weather or it was impracticable to collect samples within the first 30 minutes of a measurable storm event) (see Parts 3.2.3 and 6.1.5)</li> </ul>		
Corrective action documentation (see Part 4.4)		
<ul> <li>Documentation of any benchmark exceedances and the type of response to the exceedance employed including the following:</li> </ul>		
- The corrective action taken;		
- A finding that the exceedance was due to natural background pollutant levels;		
<ul> <li>A determination from EPA that benchmark monitoring can be discontinued because the exceedance was due to run-on; OR</li> </ul>		
<ul> <li>A finding that no further pollutant reductions were technologically available and economically practicable and achievable in light of best industry practice consistent with Part 6.2.1.2</li> </ul>		
<ul> <li>Documentation to support any determination that pollutants of concern are not expected to be present above natural background levels if you discharge directly to impaired waters and that such pollutants were not detected in your discharge or were solely attributable to natural background sources. (see Part 6.2.4.1)</li> </ul>		
<ul> <li>Documentation supporting that stormwater discharges, allowable non-stormwater discharges, and stormwater discharge-related activities are not likely to adversely affect any species that are federally listed as endangered or threatened ("listed") and are not likely to adversely affect habitat that is designated as "critical habitat" under the Endangered Species Act (see Part 1.1.4.5).</li> </ul>		
<ul> <li>Documentation supporting the determination that stormwater discharges, allowable non- stormwater discharges, and stormwater discharge-related activities meet one of the eligibility criteria for historic property preservation (Criterion A, B, C or D) (see Part 1.1.4.6).</li> </ul>		
All Discharge Monitoring Reports and Annual Reports	1	
<ul> <li>Support for claim that facility has changed its status from active to inactive and is unstaffed with respect to the requirements to conduct routine facility inspections, quarterly visual assessments, benchmark monitoring, and/or impaired waters monitoring.</li> </ul>		
Is the SWPPP signed and dated by a duly authorized representative (per Part B.11)?	-	
Is the Annual Report signed by a duly authorized representative (per Part B.11)?		
SWPPP Modifications		
Where a corrective action triggers a change in any of the control measures or procedures, has the SWPPP been updated within 14 calendar days of completing the corrective action (see Part 4.4)?	1	
Are SWPPP modifications signed and dated by a duly authorized representative?		
Has the SWPPP been reviewed and does documentation exist as to the modifications made or why none were needed under the following circumstances?		

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Attachment 2: MSGP SWPPP Review Guidance Checklist Example (cont.)
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REQUIREMENT	YES/NO	NOTES
<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> </ul>		
<ul> <li>A discharge violates a numeric effluent limit listed in Table 2-1 and in the sector specific requirements.</li> </ul>		
<ul> <li>The control measures are not stringent enough for the discharge to meet applicable water quality standards or the non-numeric effluent limits in this permit.</li> </ul>		
<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 URL 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?		
<ul> <li>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);</li> </ul>		
<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>		
<ul> <li>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.</li> </ul>		
• The schedule for good housekeeping, maintenance, and schedule for all inspections required in Part 3.		

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# Attachment 2: MSGP SWPPP Review Guidance Checklist Example (cont.) $(\mathsf{Page}\ 11\ \mathsf{of}\ 11)$

REQUIREMENT	YES/NO	NOTES
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?		7
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. documented?		

### **ATTACHMENT 24: SPILL LOG**

## **SPILLS AND LEAKS (2018-2020)**

Date	Spill Location	What Spilled	Quantity Spilled	Corrective Action Taken	Outfall Affected
3/27/2019	Staging area for metal for recycle bins	Water/oily mixture	4 gallons	HAZMAT used absorbent pads and micro-blaze for the clean up	None
10/31/2019	Parking lot of Material Recycling Facility	Hydraulic oil	1/4 cup	Absorbent pads and micro-blaze were used for the clean up	None
5/20/2020	South of concrete retention pond	Lubricant oil	Less than 1 quart	Affected area on soil was cleaned up and sprayed with micro-blaze	None

### **ATTACHMENT 25: LOCAL PROCEDURES**

No. P322-3

Revision: 4

Issued: 12/10/15 Effective Date: 12/10/15

## **Performance Improvement from Abnormal Events**

### 1.0 PURPOSE

This document defines the process for notification and reporting of abnormal events at Los Alamos National Laboratory (LANL or the Laboratory). The abnormal event process is part of the LANL Contractor Assurance System (CAS), and is focused on effectively driving continuous performance improvement from each event. The intent of the investigative and analysis process is to understand and identify causes (both individual and organizational) that contributed to the event so that deficiencies identified can be addressed and corrected. Analyzing events promotes the values and concepts of a learning organization envisioned in the Integrated Safety Management (ISM) Program Feedback and Improvement function. Events that pose an immediate threat to life or property are subject to additional emergency notification requirements. See Section 2.3.

### 2.0 AUTHORITY AND APPLICABILITY

### 2.1 Authority

This document is issued under the authority of the Laboratory Director to direct the management and operation of the Laboratory, as delegated to the Contractor Assurance Officer (CAO), as provided in the <a href="Prime Contract">Prime Contract</a>. This document derives from the Laboratory <a href="Governing Policies">Governing Policies</a>, particularly the section on Management Systems, and <a href="SD320">SD320</a>, Los Alamos National Laboratory <a href="Contractor Assurance System Description Document">Contractor Assurance System Description Document</a>.

- Issuing Authority (IA): Contractor Assurance Officer (CAO)
- Responsible Manager (RM): Quality and Performance Assurance (QPA) Division Leader
- Responsible Office (RO): Quality and Performance Assurance
   –Performance Assurance
   (QPA-PA)

### 2.2 Applicability

This document applies to all Laboratory workers, including employees of Los Alamos National Security, LLC (LANS), its contractors/subcontractors, students, guests, affiliates, or visitors. This document applies to work-related events onsite, i.e., within the physical boundaries of LANL, and off-site when the workers are (1) in LANL pay status, and (2) working under LANL procedures and requirements. Events involving LANL workers that occur at another Department of Energy (DOE)/National Nuclear Security Administration (NNSA) contractor site and where the work is under that site's procedures and requirements are managed by that site's abnormal event process.

Abnormal events include all abnormal conditions, accidents, incidents, or deviations from the planned outcome of a workplace activity that did or could have adversely affect(ed) health or safety of workers, the public, the environment, or the integrity of LANL programs or facilities.

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Roles assigned in this document are based on P313, Roles, Responsibilities, Authorities, and Accountability. Key roles are filled by the Facility Operations Directors (FODs) and trained occurrence investigators from QPA-PA who support the FODs. The term FOD in this document refers to individuals in the Nuclear and High-Hazard Operations Directorate (NHHO). However, for events that do not fall within the boundary of an NHHO-managed FOD Unit, institutional program managers may fill the FOD role as defined in DOE O 232.2, Occurrence Reporting and Processing of Operations Information. Examples may include the following:

- construction/demolition project managers for events within their project;
- Subject Matter Experts (SMEs), such as managers from Environmental Protection (ENV) for environmental-related notices of violation, Operations Support-Packaging and Transportation (OS-PT) for P&T-related institutional events, and the Safety Basis Office for institutionalrelated safety basis issues;
- senior management for wildland fires impacting LANL property;
- institutional program owners such as for the beryllium, crane, hoisting and rigging, and electrical safety programs for multi-facility events or events with institutional impact; and
- the Laboratory Director or designee for Team Investigations.

Although programmatic management or SMEs may assume ownership of the event, the local area FOD and/or the Associate Director for Nuclear and High-Hazard Operations (ADNHHO) should be engaged to provide guidance, the infrastructure, and resources necessary to ensure consistent application of the reporting process.

Management authority and responsibility for execution of the abnormal event process are assigned to the FODs. FODs may delegate responsibilities and authorities for the abnormal event process to Operations Managers or Duty Officers. Facility-owning Responsible Associate Directors (RADs) establish their involvement in the process through agreements with the FODs. QPA-PA maintains details of and procedures for the abnormal event process on the Occurrence Reporting webpage and in the current Functional Series Document (FSD) QPA-PA-FSD-003, Abnormal Events Handbook. The FSD describes in detail all the aspects of the LANL abnormal event reporting process, including event discovery, notification, categorization, fact finding, investigation, causal analysis, and final report preparation. Attachment A, Abnormal Event Categorization Criteria, of the FSD provides SME guidance (e.g., from health and safety, ENV, Suspect/Counterfeit Items Coordinator [SCIC], Safety Basis, P&T) to assist the FOD/designee with event categorization. The FSD defines the roles and responsibilities for the FODs, occurrence investigators, and the necessary support personnel.

### 2.3 Precautions and Limitations

Processes related to Operational Emergencies (OEs), security incidents, and the Price-Anderson Amendments Act (PAAA)/Worker Safety and Health (WSH) program are beyond the scope of this document, and in some instances preempt requirements of this document. Examples follow.

Operational Emergencies (OEs). Events requiring emergency response (e.g., explosion, fire, hazardous material release) are subject to categorization, notifications, and response under PD1200, Emergency Management, and SEO-DO-PLAN-100, Hazardous Materials Program Emergency Plan, available through the Emergency Operations Center at 667-6211, plus any facility-specific emergency management plans and procedures. For the duration of emergency conditions, Security and Emergency Operations (SEO) personnel and procedures take precedence and preempt the requirements of this document.

Workers witnessing or involved in such events must immediately request assistance by calling 911 and/or Security and Emergency Operations-Emergency Management (SEO-EM, 667-6211) as noted in Attachment A, *Abnormal Event Process*.

It is recommended that the FOD/RAD and/or line management contact SEO Division immediately for assistance with severe events that do or might meet OE criteria. SEO personnel manage all verbal and written communications regarding a declared OE, both internal and external to LANL and from declaration through termination of the emergency condition.

After SEO personnel terminate the OE, the FOD regains control of the event scene and the balance of the abnormal event process proceeds according to this document.

**Security Incidents**. Workers must report incidents of known or potential security concern to the Security Incident Team (SIT) in accordance with requirements in P201-3, Reporting Known and Potential Incidents of Security Concern. Events strictly of security concern are not subject to the requirements in this document. For events that present components of security concern but also safety or operational issues, the FOD must work with the SIT to ensure requirements of this document and P201-3 are met. Contact the SIT for assistance with the security incident program.

**Price-Anderson Amendments Act/Worker Safety and Health (PAAA/WSH)**. Events at all levels of severity (Occurrence Reporting and Processing System [ORPS] and Sub-ORPS) are subject to all requirements in this document, but also to additional screening and possibly reporting to the DOE Noncompliance Tracking System (NTS) in accordance with <u>P141</u>, *Price Anderson Amendments Act (PAAA), Worker Safety and Health (WSH), and Classified Information Security (CIS) Enforcement Procedure.* Contact the local PAAA Point of Contact and/or PAAA Coordinators in the <u>QPA PAAA Program Office</u> for assistance with this program.

### 3.0 PROCEDURE DESCRIPTION

The Laboratory implements a graded approach for investigating and resolving abnormal events. See Table 1 for a summary of the three-tier graded approach, and Attachment A, *Abnormal Event Process*, for the process flow at each of the three tiers.

Table 1. Graded Approach	to Abnormal Events	
Event Type	Examples	Who Investigates/Resolves
Certain high-profile Occurrence Reporting and Processing System (ORPS)-reportable events (i.e., Operational Emergency [OE], Significance Category [SC]1 or Significance Category Recurring [SCR]) may be subject to a Team Investigation	<ul> <li>Fatality, terminal or disabling injury</li> <li>Criticality accident or near miss</li> <li>Radiation exposure exceeding limits for a worker or member of the public</li> </ul>	<ul> <li>A team appointed by the Laboratory Director (DIR) or designee investigates events and resolves concerns.</li> <li>Management oversees Corrective Action Plan (CAP) and response in accordance with the charter memo (see Section 3.11). In the absence of a charter memo, the Contractor Assurance Officer (CAO) will assign the CAP oversight responsibility.</li> <li>A team appointed by the Facility Operations Director (FOD)/Responsible Associate Director (RAD) investigates events and resolves concerns.</li> </ul>
Low- to moderate- significance ORPS-	<ul> <li>Injury requiring hospitalization</li> </ul>	FODs and qualified Quality and Performance Assurance

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reportable events that exceed the ORPS thresholds	<ul> <li>Failures of safety-required equipment</li> <li>Moderate-hazard electrical shock events</li> <li>Violations of safety requirements</li> </ul>	Performance Assurance (QPA-PA) investigators investigate event.  Appropriate Management Review Boards (MRBs) oversee corrective action.
Sub-ORPS events that fall below the ORPS thresholds	<ul> <li>Minor workplace incidents or near misses</li> <li>Minor equipment failures</li> <li>Operational concerns resulting in pause or stop work</li> </ul>	<ul> <li>Improvement Responsible Managers (IRMs) from the facility or program where the event occurred investigate event.</li> <li>Local MRB oversees corrective action.</li> </ul>

# 3.1 Notify Management of an Abnormal Event

Abnormal events at LANL require immediate management notifications. Workers generally witness first hand or discover evidence of abnormal events, and must recognize the abnormality, stabilize the situation to the extent possible and safe to do so (e.g., pause or stop work), and initiate the notifications to their chain of facility and line management.

Workers who are involved in any abnormal event or who discover any abnormal condition must do the following:

- notify their immediate supervisor, or the first immediately available manager in the worker's chain of command; and
- notify the FOD or designee if required by local procedures or if their immediate supervisor is unavailable.

Supervisors and first line managers, group-level managers, and division-level managers who are notified by a worker or in any way become aware of an abnormal event must do the following:

- ensure notification of the FOD/designee for all abnormal events;
- notify the first immediately available manager in their upward chain; and
- follow any additional FOD or RAD expectations for additional notifications.

RADs, upon being notified of an abnormal event in their facility and based on the significance of the event, should do the following:

- consult with the FOD/designee on response to the event and to ensure that compensatory
  measures for significant conditions adverse to quality are in place prior to the resumption of
  work;
- notify their Principal Associate Director (PAD);
- notify the DIR; and
- notify affected sponsors or external program managers of the involved facility or project.

The management notifications described above are generally verbal. The FOD is responsible for official written notification of the event in accordance with Section 3.3.

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# 3.2 Categorize the Event

The FOD categorizes all nonemergency abnormal events within two hours of the discovery date/time, or as soon thereafter as reasonably possible. This categorization is critical because it sets the course for the level of investigating and reporting and the subsequent involvement of investigators. The FOD or designee must gather key facts, decide whether an abnormal event has in fact occurred, and categorize the event as either ORPS reportable or Sub-ORPS reportable. Categorization follows the reporting criteria of <a href="DOE O 232.2">DOE O 232.2</a>, Occurrence Reporting and Processing of Operations Information. DOE reporting and categorization criteria and QPA-PA procedures are found on the <a href="Occurrence Reporting">Occurrence Reporting</a> webpage. Events falling below the ORPS thresholds are processed as Sub-ORPS. See Section 3.10.

The event categorization establishes the next steps, including the following:

- External notifications to include the DOE/NNSA-Los Alamos Field Office (NA-LA) Facility Representative (FR) and possibly DOE Headquarters Operations Center (HQ OC).
- Reporting timelines.
- Rigor applied to the investigation, causal analysis, and corrective action development.
- Approvals required for the final report.

Categorization places each ORPS-reportable event into a Significance Category (SC) based on DOE requirements as follows:

- OE (as defined in <u>DOE O 151.1C</u>, Comprehensive Emergency Management System). Major unplanned or abnormal events or conditions that: involve or affect DOE/NNSA facilities and activities by causing, or having the potential to cause, serious health and safety or environmental impacts; require resources from outside the immediate/affected area or local event scene to supplement the initial response; and, require time-urgent notifications to initiate response activities at locations beyond the event scene. OEs are the most serious occurrences and require an increased alert status for onsite personnel and, in specified cases, for offsite authorities.
- SC 1. Non-OE events that caused actual harm; posed the potential for immediate harm or
  mission interruption due to safety system failure and required prompt mitigative action; or
  constituted an egregious noncompliance with regulatory requirements that created the potential
  for actual harm or mission interruption.
- SC 2. Circumstances that reflected degraded safety margins necessitating prompt
  management attention along with modified normal operations to prevent an adverse effect on
  safe facility operations; worker or public safety and health, including significant personnel
  injuries; regulatory compliance; or public/business interests.
- SC 3. Events or circumstances with localized implications including personnel injury, environmental releases, equipment damage or hazardous circumstances that were locally contained and did not immediately suggest broader systemic concerns.
- SC 4. Events or circumstances that were mitigated or contained by normal operating practices, but where reporting provides potential learning opportunities for others.
- SC R. Recurring occurrences are those identified as recurring, either directly or through periodic analysis of occurrences and other non-reportable events.

If early information is incomplete, the FOD must categorize conservatively (at the higher level being considered) within two hours, then adjust the category at the fact finding (the worker-involved meeting to discuss the abnormal event) or as more information becomes available.

**Note**: Disputes about categorization may be encountered at any time in the ORPS process but are most common on initial, pre-fact finding categorization or in the management close out portion of the fact finding (see Section 3.3). Differences of opinion are most common in subjective cases falling under Group 10, *Management Concerns/Issues*, but may occur in cases falling under the more objective Groups 1–9 (see QPA-PA-FSD-003, *Abnormal Events Handbook* for definitions of these groups). If consensus on categorization is not possible (e.g., disputes involving the NA-LA FR), the FOD is responsible for coordinating with the RAD and resolving the dispute. If necessary, the FOD and RAD are expected to escalate the decision via the appropriate LANL chain of command. The investigator should remain advisory to this discussion, bringing to the table knowledge of prior similar event categorizations and, as possible, fostering institutional consistency even in the most subjective areas of the categorization process.

**Note**: If, in the investigator's professional opinion, a reporting decision finalized by the FOD is clearly inconsistent with the objective elements of the DOE reporting criteria, the investigator must advise the FOD of this opinion, explain the technical basis for the opinion, and attempt to negotiate resolution. If the discrepancy remains unresolved, the investigator must report the unresolved disagreement to the QPA-PA Group Leader for his/her advice and possible direct involvement in the discussion with ADNHHO, if necessary.

# 3.3 Transmit Prompt (E-mail) Event/Incident Notification

As soon as possible after categorization, the FOD or designee sends an Event Notification to key stakeholders both inside and outside LANL with the best available information about the event. The Event Notification is sent to <a href="mailto:nhonotification@lanl.gov">nhonotification@lanl.gov</a> and includes the following information:

- Date/time of discovery
- Date/time of categorization
- FOD and RAD
- Location of the event (TA/Building; facility name, room)
- Event title and description
- Whether the event is ORPS-reportable or Sub-ORPS
- If ORPS reportable, include the significance category, the event reporting criterion, and whether or not a fact finding will be held.

### 3.4 Fact Finding for the Event

The fact finding is a discovery and learning opportunity that is the central, first step in launching an effective partnership between workers, supervisors, and managers to understand events and conditions. The purpose of a fact finding is to have workers discuss the various facts surrounding an event and any associated conditions, both positive and negative, with an overall objective to learn and improve.

Fact findings consist of two functional parts: (1) the required worker/responder segment, with the purpose of listening to the story as told by involved workers and responders, understanding and learning about the event, and reviewing compensatory actions already taken; and (2) the management closeout segment for supervisors/managers, where workers/responders are typically excused and discussion focuses on additional immediate or compensatory actions, confirmation and/or determination of categorization, and the scope of the investigation and causal analysis as well as consideration for any extent of condition evaluation.

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The FOD has the responsibility and authority for the fact finding process. Fact findings are optional at FOD and/or RAD discretion, based on whether a discussion of the facts surrounding the event provides a reasonable opportunity for organizational learning. Examples of events that may not warrant a fact finding include receipt of Notices of Violation (NOVs), environmental related releases, and discovery of Suspect Counterfeit Items (S/CIs).

All fact findings at the Laboratory should meet the following four key expectations:

- Conduct fact finding (if held) in a timely manner to ensure reporting requirements are met. See Table 2 for reporting timelines.
- Attendance in the worker/responder portion of the fact finding should include those individuals involved in the event, including immediate response personnel. The FOD is responsible to work with the RAD and ensure that the necessary attendees are identified and invited to the fact finding. Recommended attendance at the worker/responder portion of fact findings is as follows (Note: an asterisk indicates the minimum recommended attendance):
  - FOD\*
  - Involved worker(s)\*
  - QPA-PA investigator\* (for ORPS)
  - FOD Improvement Management Coordinator (IMC)\* (required for Sub-ORPS)
  - Witnesses
  - Key responders\*
  - Immediate supervisor/manager of involved worker(s)
  - Key SMEs (e.g., Health Physicist [HP], Industrial Hygienist [IH], electrical Authority Having Jurisdiction [AHJ])
  - PAAA office coordinator (invited)
  - NA-LA FR (invited)
  - Defense Nuclear Facilities Safety Board (DNFSB) representative (invited for nuclear facilities)
  - Nuclear Criticality Safety Committee (invited for all criticality safety-related fact findings)

FODs must invite the PAAA office coordinator, the NA-LA FR, and DNFSB representative to all fact findings (DNFSB representative for nuclear facilities only), but attendance is at their discretion. Phone, e-mail, or pager messages can serve as notification.

Attendance by line management is optional; however, immediate supervisors and managers are encouraged to attend fact findings. It is important to maintain the fact finding as a discovery and learning exercise, not a management briefing, an investigation, or a corrective action session. Therefore, it is the FOD/RAD's authority to manage the attendance size of the fact finding. Additional guidance for fact finding attendance is available in <a href="QPA-PA-FSD-003">QPA-PA-FSD-003</a>, Abnormal Events Handbook.

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The PAAA office coordinator, NA-LA FRs, Nuclear Criticality Safety Committee representative (for criticality safety related events), and DNFSB representatives must be invited to all fact findings, but attendance is at their discretion and timely held fact findings will proceed on schedule even in the absence of these parties. These attendance guidelines for LANL fact findings apply equally to all events, from minor to the most severe.

- Attendees must strive to arrive at the fact finding with relevant documentation (e.g., photos, schematics, change notices, work packages, and/or relevant procedures/policies) to support establishment of the factual information.
- The fact finding must be an open discussion forum that exhibits all of the attributes of a
  positive safety culture. A healthy fact finding process is one cornerstone of a learning
  organization and, if well executed, will result in management and employees continually
  exhibiting all of the positive safety culture attributes of leadership, employee engagement, and
  organizational learning.

Positive safety culture attributes suggested for all LANL fact findings are listed below. These elements honor Human Performance Improvement (HPI) principles and should be encouraged by managers and attendees involved in all fact findings.

- All individuals directly involved in the event are in attendance.
- The facilitator/FOD, and management in attendance, set and maintain the tone for the fact finding as an open, no-fault, candid, learning environment at all times. If necessary, the facilitator/FOD promptly reminds those in attendance of the ground rules and prevents overt or covert placing of blame. The facilitator/FOD will excuse any individual who will not exhibit this or any other positive safety culture attribute.
- The dialogue is open and professional and all in attendance are treated equally and respectfully.
- There is no evidence of placing blame.
- Directly involved employees do most of the talking with minimal interruptions.
- Management and all attendees are actively listening. Body language and actions suggest genuine interest in hearing and learning from involved workers and responders.
- As a rule, attendees are to refrain from cell phone use, including texting or e-mail, and should not engage in any other distracting behavior during a fact finding. Fact finding attendees, especially management and oversight, do not shift the discussion towards a pre-conceived determination of individual failures in responsibility.
- Attendees do not prevent the free flow of factual information.
- Individuals should be comfortable and willing to speak up regarding the facts, including what they observed.
- The emphasis of the fact finding is on discovery, learning, and understanding the conditions associated with the event, rather than responsibility, cause, or correction.
- Participants demonstrate the intent to question, learn, and engage others to understand all aspects of an event and underlying conditions.
- Attendees discuss what went "right" in addition to what went "wrong."
- FOD/RAD and/or facilitator recognize and commend participants for self-identification of errors and/or the demonstration of behaviors consistent with positive safety culture principles.

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Involved workers, responders, managers and SMEs called upon to attend the fact finding must candidly explain the sequence of events leading up to, during, and immediately following the event. Though constructive, technical, and professional debate is considered healthy and is encouraged, participants must remain cordial and professional in their demeanor and must cooperate fully with the FOD and/or fact finding facilitator.

# 3.5 Open Event Record in the Performance Feedback and Improvement Tracking System (PFITS) and ORPS

For all ORPS-reportable events, the IMC opens a record in PFITS and the QPA-PA investigator as the agent for the FOD or designee enters a parallel record into the DOE ORPS system. PFITS maintenance beginning at this step is according to the locally applied Performance Feedback and Improvement (PFI) processes, administered with support of IMCs.

**Note:** For Sub-ORPS events where review showed that no significant event or condition occurred or existed, such as a false fire alarm, entry of a record into PFITS is only required if facility and line management determine that additional review and corrective action is required.

Consistency between the ORPS and PFITS systems is ensured at this stage when the IMC attaches the written ORPS Notification Report to the PFITS record. The QPA-PA investigator provides assistance to the FOD in generating the Notification Report, or for SC 4 events, the Notification/Final Report, in the ORPS system. Upon FOD or designee approval, the QPA-PA investigator must submit Notification Reports to the ORPS system according to Table 2.

Table 2. Timeline for Submission of Notification Reports in ORPS System		
Significance Category	Timelines*	
Operational Emergencies (defined by <u>DOE O 151.1C</u> , Comprehensive Emergency Management System) <sup>†</sup>	<ul> <li>Categorize: ASAP</li> <li>Prompt Notification: 30 min</li> <li>(15 min if further classified)</li> <li>Written Notification: Close of Business (COB) the day following the event categorization, not to exceed 90 hours</li> <li>Final Report: 45 calendar days</li> </ul>	
Significance Category 1	<ul> <li>Categorize: 2 hours</li> <li>Prompt Notification: 2 hours</li> <li>Written Notification: COB the day following event categorization, not to exceed 90 hours</li> <li>Final Report: 45 calendar days</li> </ul>	
Significance Category R	<ul> <li>Categorize: Time of SC R determination</li> <li>Written Notification: COB 2 business days after event categorization</li> <li>Final Report: 45 calendar days</li> </ul>	
Significance Category 2 <sup>^</sup>	<ul> <li>Categorize: 2 hours</li> <li>Prompt Notification: 2 hours</li> <li>Written Notification: COB the day following event categorization</li> <li>Final Report: 45 calendar days</li> </ul>	
Significance Category 3 <sup>^</sup>	<ul> <li>Categorize: 2 hours</li> <li>Prompt Notification: 2 hours</li> <li>Written Notification: COB 2 business days after the event categorization</li> <li>Final Report: 45 calendar days</li> </ul>	

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Table 2. Timeline for Submission of Notification Reports in ORPS System		
Significance Category	Timelines*	
Significance Category 4 <sup>^</sup>	<ul> <li>Categorize: 2 hours</li> <li>Prompt Notification: 2 hours (if required)</li> <li>Written Notification/Final Report: COB 2 business days after the event categorization</li> </ul>	
<ul> <li>Categorization and Prompt Notification requirements are in accordance with <u>DOE O 151.1C</u>, Comprehensive Emergency Management System.</li> <li>Categorization Time is from Discovery date, and time. Notification is from Categorization date and time. Written Notification is from Categorization date, and time.</li> <li>Specific Significance Category 2, 3, and 4 occurrences (identified with * in <u>DOE O 232.2</u>, Occurrence Reporting and Processing of Operations Information, Attachment 2, Reporting Criteria) also require Prompt Notification to the DOE Headquarters Emergency Operations Center (HQ EOC).</li> </ul>		

### 3.6 Investigate

Investigations are required for ORPS-reportable events, and are normally conducted by the QPA-PA investigator. Investigations for Sub-ORPS events are required only for more significant events (see Table 1 for examples). Sub-ORPS investigations, if performed, are generally led by the IRM with assistance from the IMC (see Section 3.10). The most serious events (see Table 1) are investigated by a multidisciplinary team (see Section 3.11). All investigations of abnormal events are graded to the risk or significance of the event, and are performed by individuals trained according to P322-1, Causal Analysis and Corrective Action Development. Additional ORPS and causal analysis grading detail is available in the current FSD, QPA-PA-FSD-003, Abnormal Events Handbook.

The lead investigator may consult with SMEs, to include HPI Practitioners, as deemed necessary to understand the specific event.

### 3.7 Determine Causal Factors

Causal analysis is required for ORPS events in SCs OE/1/2/3/R, and is optional for SC 4 or Sub-ORPS events or conditions. ORPS causal analysis is led by the QPA-PA investigator as the agent of the FOD, or by the Team Chair for Team Investigations (see Section 3.11). Causal analysis for Sub-ORPS events is required only for more significant events, in accordance with criteria found in P322-4, Laboratory Performance Feedback and Improvement Process.

Generally, the IRM leads the sub-ORPS causal analysis, if performed. The IRM may request assistance from the IMC or other support personnel. HPI-trained personnel may also assist with Sub-ORPS event analysis, as requested by the owning FOD or RAD management (see Section 3.10).

The target for completion of an ORPS causal analysis is 20 business days after categorization of the event. A similar timeframe is recommended but not required for Team Investigations and Sub-ORPS events (see Attachment A, *Abnormal Event Process*). For all abnormal events the causal analysis is performed as described in <a href="P322-1">P322-1</a>, Causal Analysis and Corrective Action Development.

# 3.8 Develop Corrective Actions

Corrective action development in response to identified causal factors is the same for all abnormal events (events requiring Team Investigations, ORPS-reportable events, and Sub-ORPS events) and follows event-related PFI processes within facilities and programs. PFI processes are described in <a href="P322-1">P322-1</a>, Causal Analysis and Corrective Action Development and <a href="P322-4">P322-4</a>, Laboratory Performance Feedback and Improvement Process.

Recording and tracking of corrective actions occurs in both the DOE ORPS and the LANL PFITS systems. Upon FOD or designee approval, the QPA-PA investigator enters corrective action statements into the ORPS Final Report. The IMC manages detailed action plans and all tracking of actions to closure, including changes to the due date or content of the action, using the PFI process and the PFITS system. For ORPS corrective actions in final reports of OE, SC R, SC 1 or SC 2 significance level, it is at the FOD/RAD discretion to obtain NA-LA FR approval for any target date or corrective action text changes.

ORPS Final Reports are completed within 45 calendar days from categorization of the event (except SC 4, for which Notification/Final Reports are completed in two business days, with corrective actions optional). See Attachment A, *Abnormal Event Process*. Extensions beyond 45 days are coordinated between the FOD and QPA-PA investigator, and require FOD concurrence. Team Investigations follow a schedule established in the charter process. See Section 3.11.

Closure of Sub-ORPS events that are entered into PFITS follows requirements in <u>P322-4</u>. The IMC maintains all material that supports any investigation/evaluation and closure of the Sub-ORPS event in the PFITS record (see Section 3.10).

# 3.9 Submit Final Report in PFITS and ORPS

For ORPS-reportable events, FODs approve by signature and own the Final Report. QPA-PA staff assist with filling all required Final Report fields and obtaining Derivative Classifier (DC) review. With IMC support, QPA and the FOD ensure recording of the ORPS Final Report in the PFITS system. The PFITS record comprises the official record of corrective actions and concurrence of all assigned action owners.

The QPA-PA investigator enters Team Investigation reports into the ORPS system, but the investigations are also conducted and published in accordance with the conditions of the Team Investigation charter memo. See Section 3.11.

# 3.10 Sub-ORPS Events

By definition, Sub-ORPS events include all events reported by the FOD in an Event/Incident Notification that do not meet any ORPS threshold. The Laboratory does not publish de minimis criteria or a "floor" for incidents warranting Event/Incident Notification, i.e., Sub-ORPS reporting. FODs are expected to use operational experience, professional judgment, and common sense in their decisions. The ADNHHO is authorized and responsible for guidance and oversight of the Sub-ORPS reporting decision process.

Management notifications (see Section 3.1), categorization by the FOD (see Section 3.2), and Event Notification (see Section 3.3) apply to both ORPS and Sub-ORPS events. Process steps described in Sections 3.4 through 3.9 are carried out for Sub-ORPS events with the roles shifted from the FOD and QPA-PA investigators to responsible managers and IMCs in the facilities and programs. These differences from ORPS-reportable events are noted in each section above. (See Sections 3.1 through 3.9).

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The IMC enters sub-ORPS records into PFITS and assigns them the appropriate level of the PFI significance hierarchy based on criteria in P322-4, Laboratory Performance Feedback and Improvement Process, and, if applicable, P141, Price Anderson Amendments Act (PAAA), Worker Safety and Health (WSH), and Classified Information Security (CIS) Enforcement Procedure.

# 3.11 Team Investigations

The highest level of investigation, analysis, and corrective action development is reserved for the most significant, high-risk ORPS-reportable occurrences. Team Investigations are undertaken based on LANL prerogative, most commonly for certain OEs and the most serious or recurrent nonemergency events (e.g., SC 1 and SC R [see Table 1 for details]). Team Investigations are chartered formally by the DIR or designee, generally involve more formal investigation and causal analysis methods, and are followed by a more comprehensive corrective action process than routine ORPS investigations. As part of the Team Investigation process, the senior management and ORPS investigator must establish support staff to enter the results of the evaluation into the PFI process, which is typically the IMC of the affected FOD organization.

The sponsoring group should recommend that the following individuals participate in the Team Investigation:

- FOD with responsibility for the facility
- RAD with responsibility for the facility and/or the programmatic activities involved in the event
- ADNHHO
- ORPS investigator and/or assigned causal analyst
- Administrative support
- Technical writer/editor
- SMEs (to include safety experts, technical SMEs, and/or HPI Practitioners)

**Note:** The charter memo outlines the team membership, the scope of the investigation, the team deliverables, due dates, and the accepting authority for the investigation results. However, small teams may be tasked by a FOD and/or RAD without a charter memo to enhance organizational involvement and learning from the investigation process. For ORPS-reportable events, the QPA-PA investigator enters the results of the Team Investigation into the ORPS system.

When a Team Investigation is declared, the FOD ensures the event scene is preserved and authority for managing access to the scene is formally turned over to the Team Chair.

Team members and consultants are appointed as needed, up to full-time, to the investigation. The Team Chair has authority to enlist additional resources (safety experts, HPI Practitioners, etc.) as deemed necessary. Sponsoring senior management determines and approves any resource and cost allocations for the team's effort. All members of the team fulfill their responsibilities in accordance with the charter memo.

In addition, while not usually stipulated in the investigation charter, management and/or the investigation sponsor and the investigation team must consider the logistics for the investigative effort and should consider development and management of a corrective action plan after the investigation report is accepted.

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#### 4.0 **RESPONSIBILITIES**

### 4.1 Laboratory Director, Deputy Director, or designated Team Investigation Sponsor

- Initiates formal Team Investigations through a charter memorandum.
- Receives and approves final reports from Team Investigations.
- Assigns RAD or other manager to oversee CAP development following the Team Investigation report submittal and acceptance.

#### 4.2 Associate Directors (as Facility-Owning Responsible Associate Directors [RADs])

- Establish agreement with each sponsored FOD regarding roles, responsibilities, and RAD involvement in the abnormal event process, including categorization, fact finding, corrective action development, and report approval.
- Coordinate with the FOD on an effective PFI process that enables the timely closure of ORPS (45 days) and Sub-ORPS reports and/or records.
- For events warranting Team Investigations in an owned facility, participate as members of the local team and/or appoint a local team to conduct the investigation.
- Ensure that compensatory measures for significant conditions adverse to quality are in place prior to the resumption of work.

### 4.3 **Group- and Division-Level Managers**

- Ensure that the appropriate immediate management notifications of abnormal events are made, compliant with facility and organizational expectations.
- Cooperate with FOD, FOD staff, and QPA-PA investigators in all steps of event fact finding, Event Notification, investigation, causal analysis, and corrective action development.
- Participate in the Sub-ORPS process in accordance with FOD/RAD agreements and local PFI processes.

### 4.4 **Supervisors/First Line Managers**

- First and foremost, ensure personnel safety as part of any response.
- Ensure timely notification of the FOD and first available line manager (group-level or above) for every abnormal event within their work area or span of supervision.
- Ensure scene stabilization and evidence preservation when safe to do so.
- Cooperate with the FOD. FOD staff, and QPA-PA investigators in all steps of event fact finding, Event Notification, investigation, causal analysis, and corrective action development.

#### 4.5 Workers

- Report to supervisors or first line managers any abnormal event or condition, whether within or beyond the bounds of the assigned work area.
- Participate candidly and openly when invited to fact findings of abnormal events, or when interviewed as part of the investigation.
- Cooperate with the FOD, FOD staff, and QPA-PA investigators in all steps of event fact finding, Event Notification, investigation, causal analysis, and corrective action development.

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### 4.6 **Associate Director for Nuclear and High Hazard Operations (ADNHHO)**

- Supports performance of all Team Investigations.
- Responsible for the sub-ORPS reporting decision process.

#### 4.7 **Contractor Assurance Officer**

Support performance of all Team Investigations.

### 4.8 Facility Operations Directors (FODs) (as defined in Section 2.2)

- Establish agreement with each sponsoring RAD regarding roles, responsibilities, and RAD involvement in the abnormal event process, including categorization, fact finding, corrective action development, and report approval. Written agreements are recommended but not required.
- · Categorize each abnormal event within 2 hours of discovery, or as soon thereafter as reasonably possible.
- Conduct fact findings (if held) in a timely manner to ensure reporting requirements are met. See Table 2 for reporting timelines.
- As soon as possible after categorization, transmit an Event/Incident Notification describing the event to nhhonotification@lanl.gov.
- Ensure that required notifications to NA-LA FRs and DOE HQ OC are made within required timelines.
- Ensure that compensatory measures for significant conditions adverse to quality are in place prior to the resumption of work.
- Manage the abnormal event process for the facility, including immediate communications, fact finding, investigation, causal analysis, and handoff to the local PFI process for corrective action development.
- Review, approve, and assume ownership of the Causal Analysis Report expected by Day 20 from the QPA-PA investigator.
- Approve every written report—from Notification to Final—destined for the DOE ORPS system.
- Coordinate with the RAD on developing an effective PFI process, including MRB structure and IMC staffing, to support the closure of ORPS and Sub-ORPS abnormal event reports.
- Monitor and drive continuous improvement in meeting the target timeline of developing and providing to QPA-PA corrective actions and other report closure information by Day 40 after categorization of each ORPS-reportable event.
- · Resolve conflicts or disputes regarding any aspect of the abnormal event process, and provide field managerial support to the assigned QPA-PA investigator.
- For events warranting Team Investigation, participate as requested. For all events of any ORPS SC level that become NTS reportable, support the completion of the investigation, causal analysis, and corrective action development.

### 4.9 **Quality and Performance Assurance-Performance Assurance (QPA-PA)**

- Deploys trained occurrence investigators to support FODs in all aspects of the abnormal event process, from categorization to final report.
- Drafts for FOD review and approval all written ORPS reports.

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- Submits all FOD-approved ORPS reports in the DOE ORPS system.
- Maintains official records for each ORPS-reportable event from categorization to final report.
   However, the IMC maintains and tracks to closure all ORPS action records in accordance with P322-4, Laboratory Performance Feedback and Improvement Process.
- Monitors and drives continuous improvement in meeting the target timeline of delivering draft Update/Final ORPS reports, complete with investigative findings and causal analysis, by the 20<sup>th</sup> business day after categorization.
- Provides trained occurrence investigators as requested for Team Investigations.
- Supports the Laboratory Lessons Learned process in response to abnormal events as requested.

### 5.0 IMPLEMENTATION

The requirements in this document are effective on the date of issue.

### 6.0 TRAINING

FODs, Deputy FODs, Operations Managers, Duty Officers, and all other FOD Unit personnel assigned specific ORPS responsibilities must complete the following:

- Self-Study of current version of <u>QPA-PA-FSD-003</u>, Abnormal Events Handbook
- Course #6206, Occurrence Investigating and Reporting
- Additional professional development as directed by ADNHHO

**Note:** (1) Prior completion of this course satisfies the requirement; refresher completion of Course #6206 is recommended every two years but is not a requirement. (2) If the training is neither grandfathered nor completed within 6 months of issuance of this document, the worker may continue to fulfill his/her roles and responsibilities with written authorization from ADNHHO. The written authorization will include a schedule for completing the required training and will expire if training is not completed as scheduled.

QPA-PA provides occurrence investigators who are trained in accordance with QPA-PA-QP-002, *Occurrence Investigator Training Program.* 

Managers and supervisors frequently involved in event investigations or causal analyses should consider additional professional development, including internally or externally offered material on causal analysis or human performance.

### 7.0 EXCEPTION OR VARIANCE

To obtain an exception or variance to this document, see the following instructions:

- Managers may request an exception or variance from the IA through the RM.
- At the IA's request, the RM will provide a recommendation or supporting information.
- The IA or designee will provide the requester with a written response and copy the RM.

The requesting organization must maintain the official copy of record of the approved correspondence granting the exception or variance.

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#### 8.0 **DOCUMENTS AND RECORDS**

#### 8.1 Office of Record

The Policy Office is the Laboratory Office of Record for this Institutional Document and maintains the administrative record.

QPA-PA is the Laboratory Office of Record for ORPS-reportable events, excluding corrective action records but including categorization records, Team Investigation charters, investigation records, causal analysis records, and all written reports from the initial Event/Incident Notification to the ORPS Final Report.

Responsible FOD and RAD offices are the Laboratory Offices of Record for all records related to Sub-ORPS events, and for records of corrective actions, including change control and closure records, for both Sub-ORPS and ORPS events. PFITS is the record system for all such records. Specific responsibilities are divided between FOD and RAD offices according to local eventrelated PFI processes.

#### 9.0 **DEFINITIONS AND ACRONYMS**

#### 9.1 **Definitions**

See LANL Definition of Terms.

Abnormal Event—An accident, incident, or deviation from the planned outcome of a workplace activity that did or could have adversely affected the health or safety of workers, the public, the environment, or the integrity of LANL programs, operations, or facilities.

Facility Operations Director (FOD)—Any individual designated to serve the role of FOD for the abnormal event process. These individuals include not only the NHHO FODs themselves but also any individual in the FOD staff (OM, DO, etc.) to whom the FOD has delegated primary authorities for the portion of the abnormal event process under discussion, and any individual from outside NHHO designated to fill the FOD role. These individuals are generally responsible for a collection of structures/activities or a program and serve the role of FOD for certain events that cannot be assigned to a single FOD Unit. Examples of the FOD role served from outside NHHO include the following:

- construction/demolition project managers for events within their project;
- SMEs (e.g., ENV Division Director) for multi-facility events or events with institutional impact;
- the Laboratory Director or designee for all Team Investigations.

Facility Operations Director (FOD) Unit—The collected buildings/structures/systems that bound the FOD's span of authority, in accordance with NHHO designations.

Occurrence Report—A documented evaluation of a reportable occurrence that is prepared in sufficient detail to enable the reader to assess its significance, consequences, or implications and to evaluate the actions being proposed or employed to correct the condition or to avoid recurrence.

Responsible Associate Director (RAD)—The Associate Director with overall responsibility and accountability to the Laboratory Director for the safe, secure, and environmentally compliant operations of all work within an assigned set of facilities.

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# 9.2 Acronyms

# See LANL Acronym Master List.

ADNHHO Associate Director for Nuclear and High-Hazard Operations

AHJ Authority Having Jurisdiction
CAO Contractor Assurance Officer

CAP Corrective Action Plan

CAS Contractor Assurance System

COB Close of Business
DC Derivative Classifier

DNFSB Defense Nuclear Facilities Safety Board

DOE Department of Energy ENV Environmental Protection

EOC Emergency Operations Center
FOD Facility Operations Director
FR Facility Representative
FSD Functional Series Document

HP Health Physicist

HPI Human Performance Improvement

HQ Headquarters
IA Issuing Authority
IH Industrial Hygienist

IMC Improvement Management Coordinator
IRM Improvement Responsible Manager

JON Judgment of Need

LANL Los Alamos National Laboratory
LANS Los Alamos National Security, LLC

MRB Management Review Board

NA-LA DOE/NNSA-Los Alamos Field Office
NHHO Nuclear and High-Hazard Operations
NNSA National Nuclear Security Administration

NOV Notice of Violation

NTS Noncompliance Tracking System

OC Operations Center
OE Operational Emergency

ORPS Occurrence Reporting and Processing

OS-PT Operations Support-Packaging and Transportation

PAAA Price-Anderson Amendments Act
PAD Principal Associate Director

PFI Performance Feedback and Improvement

PFITS Performance Feedback and Improvement Tracking System

QPA Quality and Performance Assurance

QPA-PA Quality and Performance Assurance—Performance Assurance

# **LANL**

RAD	Responsible Associate Director
RM	Responsible Manager
RO	Responsible Office
SC	Significance Category
S/CI	Suspect/Counterfeit Item
SCIC	Suspect/Counterfeit Items Coordinator
SCR	Significance Category Recurring
SEO	Security and Emergency Operations
SEO-EM	Security and Emergency Operations-Emergency Management
SIT	Security Incident Team
SME	Subject Matter Expert
WSH	Worker Safety and Health

# 10.0 HISTORY

Revision History		
09/20/06	ISD 322-3.0	Initial Issue, ISD 322-3.0, Manual for Communicating, Investigating, and Reporting Abnormal Events.
09/25/06	ISD 322-3.1	Administrative Change. IP300-SD5 replaced and rescinded by IP320.0.
10/15/08	ISD 322-3.2	The following Quick Changes (minor non substantive) were made:
		Global change to document: QA-OA to ESH-IO.
		Page 5, Overview, paragraph 3, add: 1. sentence: Events that do not meet ORPS reporting criteria are reported in the LIMTS system as described in <a href="P322-4">P322-4</a> , Laboratory Performance Feedback and Improvement Process. 2. add ESH Integration Office (ESH-IO) to sentence Events that meet a DOE defined reporting criterion are reported and investigated by trained and qualified
		Page 5, Overview, paragraph 4, changed to: The Associate Director for Environment, Safety, Health, and Quality is the Issuing Authority (IA) for this document. The ESH-IO Office Manager is the Responsible Manager (RM) and the Occurrence Reporting Team (OR) is the Responsible Office (RO).
		Page 8, Abnormal Event/Condition Process Outline, change bullet 14 and add bullet 15:
		<ul> <li>14) All ORPS corrective actions are entered into LIMTS and tracked as described in P322-4.</li> <li>15) ORPS events are trended and analyzed for repetitive events on a quarterly basis.</li> </ul>
		Page 13, bullets 6 and 7: Events that do not meet ORPS reporting criteria are reported in the LIMTS system as described in P322-4.
		Page 12, Note: Delete note.
		Page 13, Categorization process, item 2, second bullet, change to: Events that do not meet ORPS reporting criteria are

Revision I	,	reported in the LIMTS system as described in P322-4.
		Page 14, Preparing for a Critique, item 2, second bullet, add: must be notified.
		Page 16, item 2, add: and consider extent of condition.
		Page 17, bullet 4, change to: Events are reported in LIMTS system as described in P322-4.
12/11/08	P322-3, Rev. 0	Renumbered document, ISD 322-3, Manual for Communicating, Investigating, and Reporting Abnormal Events.
04/15/09	P322-3, Rev. 1	Quick Change
		Replace previous IA with newly identified AD.
		Clarification of existing requirements as documented in detailed individual procedures (pages 5, 7, 10, 12, 15, 17, 18)
		Revision of flowchart to reflect adherence to P322-4.
07/27/11	P322-3, Rev. 2	Major Revision
		Change title from "Manual for Communicating, Investigating, and Reporting Abnormal Events," to "Performance Improvement from Abnormal Events."
		Revise process to achieve consistency with Performance Feedback and Improvement Process changes.
		Revise organizational roles due to move of ORPS Team from Environment, Safety, Health, and Quality (ESH&Q) to CAO-P
		Change IA, RO, and RM to match organizational restructure.
09/20/12	P322-3, Rev. 3	Changed CAO-PF to Quality and Performance Assurance- Performance Assurance (QPA-PA) throughout document due to reorganization.
		Clarified language in Section 2.2.
		Updated links, titles, and acronyms.
12/10/15	P322-3, Rev. 4	Performed three-year review in accordance with PD311, Requirements System and Hierarchy.
		Changed title of notification process and system to Event Notification process and added distribution for said process as <a href="mailto:nhhonotification@lanl.gov">nhhonotification@lanl.gov</a> .
		Changed the name of the worker-involved meeting to discuss the abnormal event from "critique" to "fact finding."
		Aligned Tables 1 and 2 with QPA-PA-FSD-003, Abnormal Events Handbook.
		Added requirements of NAP-24, <i>Weapon Quality Policy</i> , to Sections 3.1 and 4.0.
		Incorporated Safety Culture attributes into Section 3.4 to include emphasis on learning and eliminating both foregone conclusions and blame-placing.
		In Section 3.4, added that fact findings are optional at FOD and/or RAD discretion, based on whether a discussion of the facts surrounding the event provides a reasonable opportunity for organizational learning.

<b>Revision History</b>	
	In Section 3.8, added that obtaining NA-LA FR approval of final ORPS report dates/text changes is at FOD/RAD discretion.
	Updated training section to account for current LANL offerings.
	Updated links, titles, and acronyms.

### 11.0 REFERENCES

# **Prime Contract:**

- DOE O 232.2, Occurrence Reporting and Processing of Operations Information, or current version
- DOE O 151.1C, Comprehensive Emergency Management System
- NAP-24, Weapon Quality Policy

### 11.1 Other References

- SD320, Los Alamos National Laboratory Contractor Assurance System Description Document
- P313, Roles, Responsibilities, Authorities, and Accountability
- Occurrence Reporting webpage
- QPA-PA-FSD-003, Abnormal Events Handbook
- PD1200, Emergency Management
- SEO-DO-PLAN-100, Hazardous Materials Program Emergency Plan
- P201-3, Reporting Known and Potential Incidents of Security Concern
- P141, Price Anderson Amendments Act (PAAA), Worker Safety and Health (WSH), and Classified Information Security (CIS) Enforcement Procedure
- QPA PAAA Program Office
- P322-1, Causal Analysis and Corrective Action Development
- P322-4, Laboratory Performance Feedback and Improvement Process
- PD311, Requirements System and Hierarchy
- P781-1, Conduct of Training

### **12.0 FORMS**

There are no forms associated with this document.

### 13.0 ATTACHMENTS

Attachment A. Abnormal Event Process

## 14.0 CONTACT

Quality and Performance Assurance-Performance Assurance Group (QPA-PA), Occurrence Investigation Team

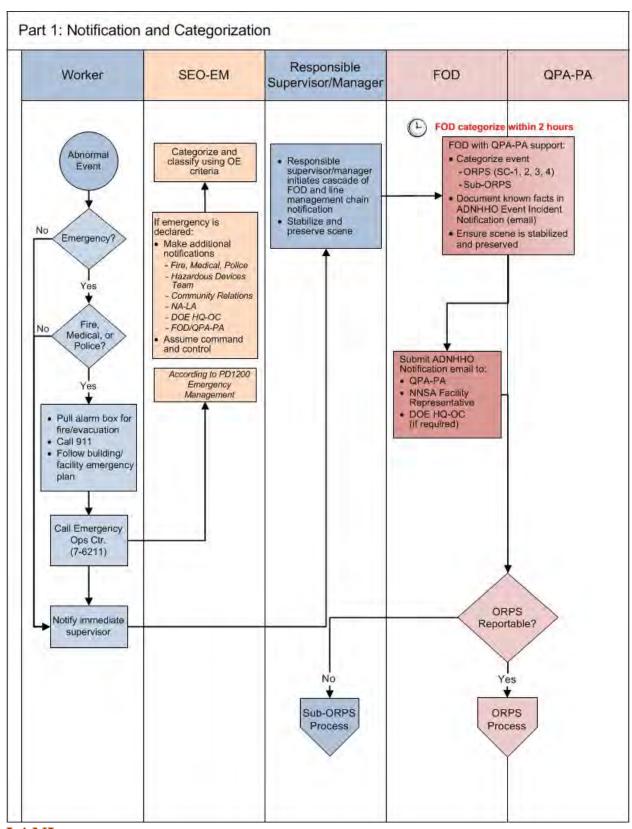
Telephone: (505) 665-0033

Occurrence Reporting webpage



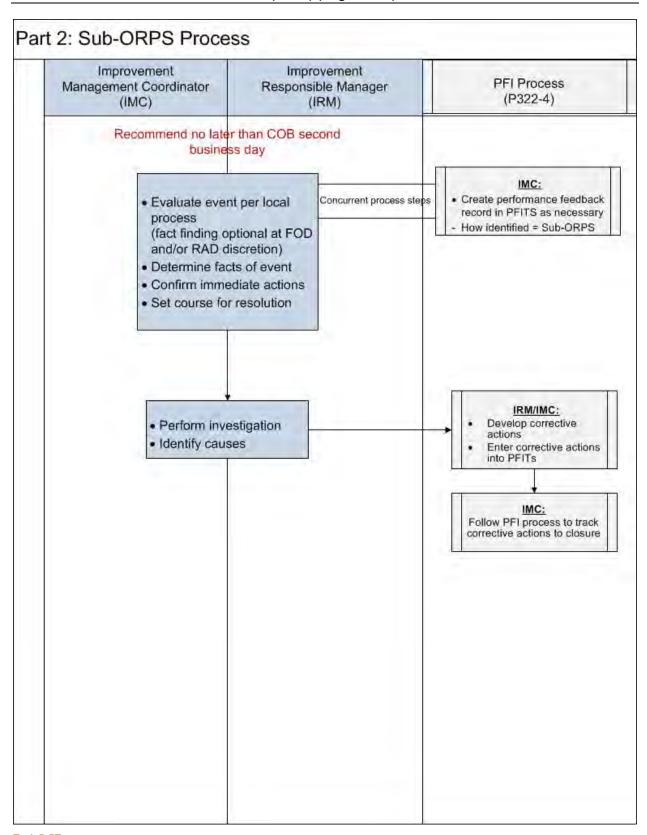
P322-3, Rev. 4 20 of 24

No: P322-3 Performance Improvement from Abnormal Events Attachment A. Abnormal Event Process (Page 1 of 4)



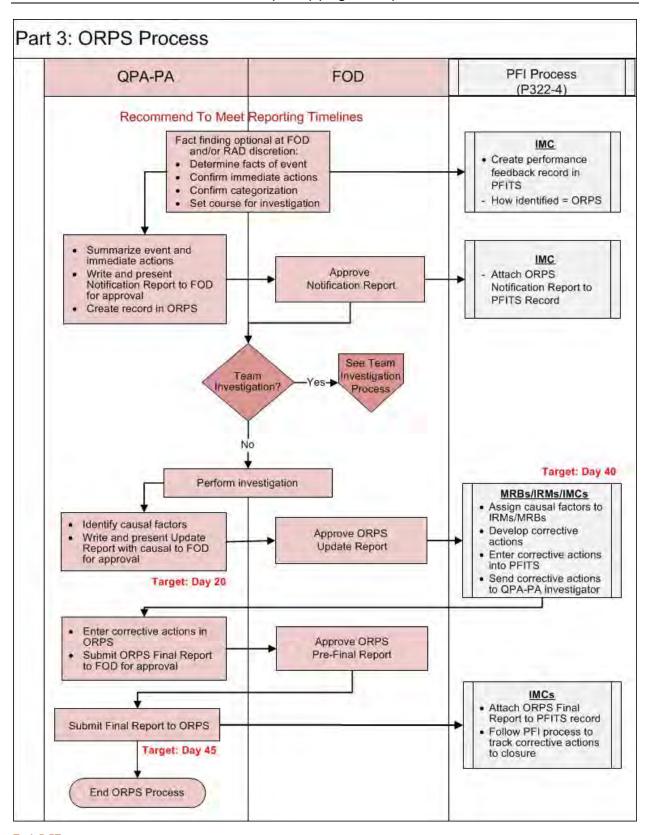
P322-3, Rev. 4 21 of 24 Effective Date: 12/10/15

No: P322-3 Performance Improvement from Abnormal Events Attachment A. Abnormal Event Process (Cont.) (Page 2 of 4)



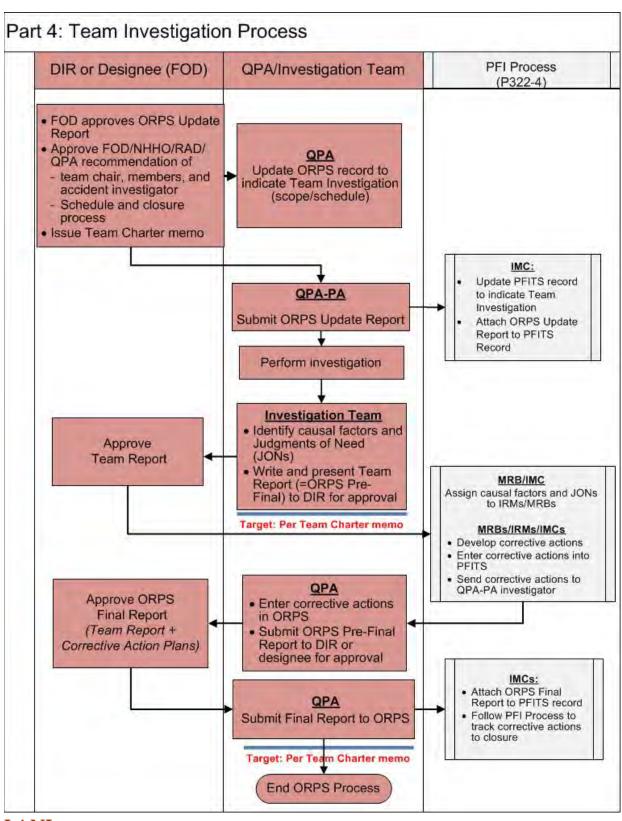
P322-3, Rev. 4 22 of 24

No: P322-3 Performance Improvement from Abnormal Events Attachment A. Abnormal Event Process (Cont.) (Page 3 of 4)



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No: P322-3 Performance Improvement from Abnormal Events Attachment A. Abnormal Event Process (Cont.) (Page 4 of 4)



P322-3, Rev. 4 24 of 24 Fffective Date: 12/10/15

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