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MSGP Stormwater Pollution Prevention Plan

for:

TA-03-38 Carpentry and Metal Fabrication Shops

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

January 2019

Revision 0

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

PREFACE

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

This SWPPP applies to discharges of stormwater from the operational areas of the TA-03-38 Carpentry and Metal Fabrication Shops (38 Shops) at Los Alamos National Laboratory. Los Alamos National Laboratory (also referred to as LANL or the “Laboratory”) is owned by the Department of Energy (DOE), and is operated by Triad. Throughout this document, the term “facility” refers to the TA-03-38 Carpentry Shop (CS) and/or the Metal Fabrication Shop (MFS). The current MSGP expires at midnight on June 4, 2020.

1.0 FACILITY DESCRIPTION

1.1 Facility Information

Name of Facility: TA-03-38 Carpentry and Metal Fabrication Shop		
Street: Southeast side of West Jemez Rd. and Bikini Atoll Intersection		
City: Los Alamos	State: NM	ZIP Code: 87545
County: Los Alamos		
NPDES ID (i.e., permit tracking number): NMR050013		
Primary Industrial Activity SIC code, and Sector and Subsector (2015 MSGP, Appendix D and Part 8): CS: SIC 2499, Sector A, Subsector A4; MFS: SIC 3411-3499, Sector AA, Subsector AA1		
Estimated area of industrial activity at site exposed to stormwater: 2 acres		
Discharge Information		
Name(s) of surface water(s)/segment that receives stormwater from your facility: Sandia Canyon (Sigma Canyon to NPDES outfall 001)		
Does this facility discharge industrial stormwater directly into any segment of an “impaired water” (see definition in 2015 MSGP, Appendix A)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Pollutants causing the impairment: Gross Alpha, Aluminum, PCB (Aroclors), Copper and Thallium		

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)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes, which guidelines apply? Not applicable.

1.2 Stormwater Pollution Prevention Team

The Stormwater PPT for the TA-03-38 Shops consists of operations and management personnel from the UI FOD and the facility, a representative from EPC-CP, and a DEP. The EPC-CP representative is responsible for subject matter expertise to ensure Laboratory compliance under the NPDES permit regulations. The team members are selected on the basis of their familiarity with the activities at the facility and the potential impacts of those activities on stormwater runoff.

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

Staff Names	Individual Responsibilities
Team/Group Leader: Russell Stone, ESH Manager, DESH, UI	Responsible for the management of all environmental, safety, health, and quality programs for the buildings and facilities listed within this Plan. This includes performing oversight and periodic walk downs to ensure implementation of the requirements of the MSGP and this SWPPP including overseeing the assigned duties of other PPT members. The Group Leader is responsible for ensuring that problems noted in inspections are corrected. The Group Leader must also ensure funding is established to cover compliance requirements of the MSGP and this SWPPP.
Deployed Environmental Professionals (DEPs): Jillian Burgin (primary), Leonard Sandoval (backup), DESH-UI	Responsible for the management of all environmental programs and issues for the buildings and facilities listed within this Plan. The DEP is responsible for training, recordkeeping, and SWPPP revision. The DEP will ensure that all PPT, operations site workers (as appropriate), and applicable supervisors receive annual MSGP and SWPPP training. The DEP will ensure that inspection documents 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 personnel regarding implementation of the MSGP and this SWPPP. Lastly, the DEP conducts routine inspections and visual assessments as required by the MSGP. Identified corrective actions from routine inspection are entered into the EPC-CP Corrective Action Report (CAR) database. The DEP is responsible for tracking and updating the status of corrective actions that cannot be implemented immediately.
FOD Manager:	Responsible for managing the operation and maintenance of all aspects of the buildings and facilities listed within this Plan. The Operations

Lawrence Chavez, Operations Manager, UI-DO	Manager shall provide review and ensure coordination with core personnel and the PPT, as appropriate, when tenants within the UI FOD propose a new process or a new site or operation that may be subject to the MSGP.
ENV Core: Holly Wheeler, MSGP Team Lead, EPC-CP	The MSGP Project Lead is responsible for managing and administering the Multi-Sector General Permit Storm Water Program for all industrial facilities within Los Alamos National Laboratory. The MSGP Project Lead advises and provides guidance to facility personnel on NPDES MSGP regulations/requirements. The MSGP Project Lead also acts as the institutional point of contact for all interactions with the regulatory authority (EPA) and supervises personnel implementing storm water monitoring requirements for the facility.
Facility Staff: Donnie Parrett Carpentry Shop Superintendent Logistics-Central Shops (LOG-CS) Thomas P. Chavez Metals Fabrication Shop Superintendent, Logistics-Central Shops (LOG-CS)	Responsible for day-to-day operations at the facility. Assisting DEPs and EPC with inspections; and implementing, installing and maintaining BMPs at the facility for MSGP compliance. Spill reporting; providing documentation as requested by other team members. Coordinating SWPPP training and briefings as requested by DEP/EPC.

1.3 Site Description

The CS is located on the far southwest corner of Building 38; and the MFS is located in the northwest portion of the Building. Industrial activities and major structures at Building 38 and shop areas are shown on the Site Maps (Figures B-1).

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

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

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

Carpentry Shop

The primary operation of this facility is the cutting of wood and fabrication of wood components for a variety of uses (primarily repair and installation jobs) around the Laboratory. All wood cutting and

fabrication is performed inside the shop, which is located in Room 101 of Building 38. The shop interior includes administrative offices and work areas with table saws, chop saws, and wood sanders.

Outdoor activities at the facility consist of the following:

- Use of the loading docks and bays for loading and unloading materials and fabricated items.
- Material storage racks (fabricated with covers) for wood and finished metals used for carpentry projects.
- Storage of lumber and scaffolding in outdoor shed (Building 03-2524).
- Storage of wood for reuse and recycling in roll-off bin with cover.
- Sternvent Cyclone Dust Collector with roll-off bin for the collection and disposal of wood dust and shavings.

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

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

There are no satellite accumulation areas for hazardous or RCRA waste inside or outside the building.

Roofing chemical products are stored inside, in Room 101D, adjacent to the Carpentry Shop.

Metal Fabrication Shop

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

Outdoor activities at the facility include the following:

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

Outfalls

Carpentry Shop

Outfall 073: Consists of a circular grated storm drain located on the northwest side of the storage shed (03-2524) in the west lot. Stormwater flows through the wood and metal storage area from the west to the outfall. Discharge runs south from the facility through TA-03 and daylights east of Building 261.

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

Starting in 2019, samples will be collected by hand (grab sample) from monitored Outfall 074. Sampling had previously been performed at an automated monitoring station located at Outfall 073 (adjacent to

the Sternvent Cyclone), however there was not enough runoff at this location to collect a sufficient sample. Due to the high volume of parking and traffic near Outfall 074, an automated monitoring station is not feasible.

Outfall 073 has been determined to be substantially identical to Outfall 074 based on common potential pollutant sources, drainage areas, activities within the drainage areas, and general site topography and characteristics. Outfall 074 also receives a significant amount of drainage from the north parking lot of Building 38, which is outside the CS boundary. Representative samples for the facility will be obtained at monitored Outfall 074 as noted above.

Metal Fabrication Shop

Outfall 002: Consists of three grated drop inlets located west of Building 38 that discharge to a single corrugated metal pipe. Stormwater flows through the facility to the outfall where automated samples are collected at **MSGP00201**. The discharge pipe runs south from the facility, through TA-03 and daylights east of Building 261. Outfall 002 is the sole outfall for the MFS. Discharge is to Sandia Canyon.

1.4 General Location Map

The general location map for the facility can be found as Figure A and provides 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 Map

The site maps are provided as Figures B-1 and illustrates 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.

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

- **Site Boundaries and Acreage.** The site covers approximately 2 acres (total)
- **Significant Structures and Impervious Surfaces.** The site is 95% impervious, primarily structures and paved lots.
- **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). A map of nearby receiving waters is provided as 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 002, 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 as Figure B-3.
- There are no non-stormwater discharges at the facility (see certification in Appendix D)
- Locations of the following activities where such activities are exposed to precipitation:
 - fueling stations (none at either shop);
 - vehicle and equipment maintenance and/or cleaning areas;
 - loading/unloading areas;
 - 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;
 - machinery; and
 - locations and sources of run-on to the site.

2.0 POTENTIAL POLLUTANT SOURCES

Carpentry Shop

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

Metal Fabrication Shop

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

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

Machine oil is stored on secondary containment units inside TA-03-37-0106, a fully enclosed storage building, where it is not exposed to stormwater. A second covered metal-for-recycle bin is located on

the southeast side of Building 38, outside the pipefitter's shop at Room 104, and is used for metal scraps brought in from pipefitting and other fieldwork.

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

The primary industrial activities that could be exposed to stormwater (and associated pollutants) for both shops are summarized (sectioned by area) in 2.1 and in the site maps listed in Figures B-1.

2.1 Potential Pollutants Associated with Industrial Activity

Carpentry Shop

- **Sternvent Cyclone/wood shavings roll-off bin:** Potential pollutants include wood dust and shavings that could leach out of roll-off bin into stormwater.
- **Wood for reuse/recycle roll-off bin with cover:** Potential pollutants include wood dust and shavings leaching out of the bin into stormwater.
- **Loading docks:** Potential pollutants include form oil or chemicals being transported by carpentry or roofing products being transported by the adjacent roofing department.
- **Material storage racks:** Potential pollutants include metal (rust) and wood materials (shavings/dust) exposed to precipitation. The racks were equipped with fabricated covers in February 2016.
- **Vehicle parking:** Potential pollutants include leakage of fuel, oil, or hydraulic fluids.
- **Trash dumpsters:** Potential pollutants include trash, debris, plastics, food, and cardboard, which can get blown around the parking lot or carried out of the dumpster by birds or other wildlife.
- **Solid Waste Management Units (SWMUs)**

There are no SWMUs or potential release sites (from legacy waste/operations) within the boundaries of the Carpentry Shop facility.

Metal Fabrication Shop

- **Metal Stockpile/Storage Yards Covered Metal Storage Racks:** Potential pollutants include metals exposed to precipitation (rust).
- **Covered Metal-Recycling Storage Bins:** Potential pollutants include processed metal shavings, turnings, small metal scraps, and cutting oil residues (if leakage occurred from container).
- **Pipe Storage Rack/Covered Metal Storage Rack:** Potential pollutants include metal pipe exposed to precipitation (rust).
- **Vehicle Parking:** Potential pollutants include leakage of fuel, oil, or hydraulic fluids.
- **Forklift Storage:** Potential pollutants include leakage of fuel, oil, or hydraulic fluids.
- **Trash & Cardboard Dumpsters:** Potential pollutants include trash, debris, plastics, food, and cardboard, which can get blown around the parking lot or carried out of the dumpster by birds or other wildlife.
- **Solid Waste Management Unit (SWMU)**

One SWMU is located within the boundaries of the Metal Fabrication Shop at the southeast corner of the west (primary) metals storage yard. It is not included as part of the LANL NPDES or Individual Permit (IP) for SWMUs at the Laboratory covered under Sector K.

SWMU 03-013(i) consists of soil and gravel contaminated from historical releases of hydraulic oil at the former locations of Buildings 03-246 and 03-247, which were used to test the tensile strength of various steel cables used in conjunction with underground nuclear test assemblies. The Facility was constructed prior to 1967 and was operated until the mid-1980s when a replacement Facility was constructed on Sigma Mesa. Building 03-246 was a corrugated metal building constructed on a concrete slab and contained the controls for the pull test equipment, as well as a hydraulic oil compressor and storage tank. Building 03-247 was a corrugated metal building constructed on a concrete curb surrounding a gravel floor and contains two hydraulic rams used to perform the tensile strength testing. Hydraulic oil was provided to the rams through underground pipes between Buildings 03-246 and 03-247. The contamination identified at SWMU 03-013(i) consisted of oil-stained soil around Building 03-246 and oil-stained gravel inside Building 03-247. At the former location of Building 03-246, hydraulic oil appears to have been released to the concrete slab floor inside the building and to have subsequently flowed beneath the building walls and onto the soil surrounding the building. Visible soil contamination existed along the north side of the building and along the northeast and northwest corners. The gravel floor inside Building 03-247 was visibly stained with oil in several locations beneath the hydraulic ram assembly.

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

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

2.2 Spills and Leaks

There have not been any spills or leaks at either shop for the past 3 years (2016-2018). Spills and leaks that occurred prior to 2016 will be documented in previous SWPPP revisions.

Areas on Site Where Potential Spills/Leaks Could Occur:

Carpentry Shop

Location	Outfalls (see site map)
Loading Dock	074
Stervent Cyclone (with covered wood shaving roll-off bin)	074
Wood reuse/recycle roll-off bin (with cover)	074
Parking Lot	073 & 074
Outdoor Storage Areas	073

Metal Fabrication Shop

Location	Outfalls (see site map)
Covered Recyclable Metal Scrap Storage Bin	002
Vehicle parking	002
Forklift storage	002
Loading and unloading operations	002
Machine oil storage area, bldg. 37, rm. 106	Oil drums and containers are indoors and also on secondary containment – not exposed to stormwater.

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

The probability of spills or releases at the facility is minimized by the application of good housekeeping procedures and appropriate operational methods. Spill protection and clean-up materials are readily available on site. Appropriate response measures for a spill or release of hazardous materials are applied when addressing spills. The specific spill response and cleanup procedures 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

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

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

2.4 Salt Storage

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

2.5 Historical Data Summary

The following tables provide sampling data at the facility for the past 3 years.

Permitted Facility: TA-3-38 Carpentry Shop

Insufficient volume was collected in 2016 to analyze for all parameters. No data are available for Total Aroclor, Al, Adjusted Gross Alpha, and TSS.

CY 2016

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.
073	—	TI	COD	—	—	—	Cu

CY 2017

Insufficient volume was collected in 2017 to analyze for all parameters. No data are available for Total Aroclor, and Adjusted Gross Alpha.

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.
073	—	—	COD, TSS	—	—	Al	Cu

CY 2018

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.
073	—	Total Aroclor	COD, TSS	—	—	Al, Adjusted Gross Alpha	Cu

Permitted Facility: TA-3-38 Metal Fabrication Shop

CY 2016

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.
002	—	Total Aroclor, TI	—	Fe, Al	NO3+NO2-N, Zn	Al, Adjusted Gross Alpha	Cu

CY 2017

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.
002	NO3+NO2-N	—	Zn	Fe	Al	Al	Cu, Adjusted Gross Alpha

CY 2018

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.
002	—	—	Al, Fe, Zn			Adjusted Gross Alpha	Al, Cu

3.0 STORMWATER CONTROL MEASURES

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

Proper material management and storage minimize the potential for exposure of precipitation and runoff to potentially hazardous materials. Containers that could be susceptible to spillage or leakage will be plainly labeled (e.g., “Used Oil,” “Spent Solvents,” etc.). Most operations are performed indoors, and materials are stored indoors or outdoors in covered or enclosed structures. The potential for exposure of industrial materials to stormwater is limited primarily to loading/unloading operations at outdoor dock areas, leaks that may occur from substation transformers or vehicle parking in the west lots. Adequate secondary containment is provided for outdoor storage units and oil containing equipment.

3.1 Non-Numeric Technology-Based Effluent Limits

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

The following Sector-Specific Non-Numeric Effluent Limits are addressed at this facility:

Carpentry Shop

- Good housekeeping: See Section 3.2.1.
- Drainage Area Site Map: See Sections 1.5 and Figures B-1.
- Inventory of Exposed Materials: See Section 2.1. This facility does not use or store chlorophenolic, creosote, or chromium-copper-arsenic formulations for wood surface protection/preserving. There are no known areas of contamination associated with these chemicals at the facility.
- Description of Stormwater Management Controls: See Section 3.1.1.
- Additional Inspection Requirements: This facility does not perform wood surface protection and preservation activities. However, routine inspections are conducted monthly at the site as described in Section 4.6.1.
- There are no areas at the Carpentry Shop where spray-down of lumber or wood products takes place.

Metal Fabrication Shop

- **Raw Steel Handling Storage:** The majority of handling and all fabrication/processing occurs inside the Metal Fabrication Shop. All shavings, turnings, and iron dust resulting from fabrication activities are contained in receptacles below each piece of machinery. Receptacles are emptied into bins located throughout the fabrication shop. Metal shavings from full bins inside the shop as well as larger metal scraps are emptied into the outside covered metal-for-recycle bins located in the northwest fenced yard. Scrap metals from pipefitter and other miscellaneous fieldwork are placed in the covered metal-for-recycle bin located outdoors at the east side of the pipefitter's shop at 3-38, Room 104. Excess piping and other metals are either placed on covered elevated racks or on pallets covered with tarps in the northwest metals storage yard or on the covered pipefitter's racks on the north side of the facility. No wastes are disposed on site.
- **Metal Fabricating Areas:** All areas are enclosed and maintained daily to ensure all shaving, turning, and iron dust is contained. Areas around all machinery are swept and inspected daily for spills. Oil absorbent for dry cleanup is readily available in the event of leakage, and all hydraulic shear and rolling machines are equipped with equipment shields.
- **Storage Areas for Raw Metal:** The outside metal storage areas including the covered metal storage racks inside the metal storage yard, northwest metal storage area, and the covered pipe storage rack are maintained in a neat, orderly state. Raw metal shavings and turnings stored outside are contained inside the covered roll off which is emptied offsite. Raw metal shavings and turnings stored inside are contained in proper receptacles and spill kits are labeled and readily accessible.
- **Metal Working Fluid Storage Area:** Cutting and drilling oils used at the facility are stored in Building 37, Room 106. The room is fully enclosed and drums are additionally stored within secondary containment. There is no exposure of this area to stormwater.
- **Cleaners and Rinse Water:** All rinse water and cleaners are located or stored inside to prevent stormwater contamination. Floor drains have either been closed or rerouted to the sanitary sewer system.
- **Lubricating Oil and Hydraulic Fluid Operations:** All operations occur inside to prevent stormwater contamination. In the case of temporary outdoor storage, secondary containment are utilized for

lubrication oils in 55 gallon drums. Metal-for-recycle bins are covered to prevent stormwater from contacting metal shavings containing cutting oil residues.

- **Chemical Storage Areas:** Any chemicals (including paints) used in the shop are kept stored indoors and inside of flammable cabinets if necessary. Chemical items are labeled appropriately and are inventoried annually through LANL's Chemlog (barcode) tracking system.
- **Spills and Leaks:** A detailed description of spill prevention and response procedures is included in Section 3.1.4. The probability of spills or releases at the facility is minimized by the application of good housekeeping procedures and appropriate operational methods. Operational procedures include drum dollies and drum grapples on the forklifts used for unloading and reloading operations.
- There are no areas at this facility where chemical formulations are sprayed to provide surface protection; and no stormwater discharges associated with this type of activity.

3.1.1 Minimize Exposure

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

Most operations and storage areas are located within structures, so that the potential for exposure of stormwater to potential pollutants is limited to the loading area and vehicle parking areas. There is no hazardous material storage or satellite accumulation areas for waste storage on site. All major wood cutting and metal fabrication activities occur inside. Specific structural controls are listed below:

Carpentry Shop

- **Sternvent Cyclone/wood shavings roll-off bin:** Wood shavings from shop saws and sanding equipment are kept fully enclosed and stored in the Sternvent Cyclone compartments. When the compartments are full they are emptied into the roll-off bin located directly below the Sternvent Cyclone. The roll-off bin is kept covered except when the Sternvent Cyclone compartments are emptied.
- **Roll off bin for scrap wood:** The roll-off bin is equipped with a rolling cover and is kept covered when not in use. The bin and its contents are removed for disposal once the bin becomes ~3/4 full.
- **Storage Shed and Racks for Wood and Metals:** Wood and metal materials are either kept enclosed in the facility storage shed (Building 03-2524) or on elevated storage racks outside the facility. The racks were fabricated with covers in February 2016.
- **Spill Control:** Craft vehicles are monitored on a regular basis for leaks and checked during monthly routine inspections. If spills or leaks are found, absorbent materials will be used immediately to contain the leak. The spill procedures listed in Section 3.1.4 will also be followed.
- **Flammable cabinet:** Form oil is kept enclosed in a flammable storage cabinet located on the west loading dock. The loading dock area is roofed and the flam cabinet is not exposed to stormwater.
- **Lids and Side Enclosures for Trash Dumpsters:** Trash dumpsters (adjacent to the facility) are normally kept closed when not in use and dumped on a regular basis. Dumpsters will be kept in good condition and will be repaired or replaced if needed by Roads & Grounds.
- **Metallox Wattle:** installed around the wood shavings roll-off bin to filter out metal residuals in stormwater runoff.

Metal Fabrication Shop

- **Covered Metal-recycling Storage Bins:** Metal shavings, turnings, and scraps are stored inside covered roll-off bins which are emptied for recycling on a routine basis.
- **Covered Metal and Pipe Storage Racks:** Metal scrap, pipe and finished/fabricated metal parts are stored on elevated racks to prevent direct contact with stormwater runoff. Where it is not feasible to store metal materials on covered racks (due to size, weight, etc.), the metal is stored off-ground on pallets and covered with sturdy, 28 mil tarps that are manufactured to last 25 years.
- **Spill Control:** Parking areas are frequently inspected for leaks and checked during monthly inspections. Oil absorbent is available in the MFS for containment if needed. Forklifts are parked inside on most occasions to reduce the potential for exposure to stormwater. Maintenance on forklifts is performed off site at the Heavy Equipment Shop.
- **Petro-Pipe Oil Barrier:** The Petro-Pipe oil barrier is installed at the end of the drain pipe that discharges excess stormwater from the trench drain/sump pump outside the pipefitter's shop. The Petro-Pipe prevents any oil that may accumulate in the trench drain from being discharged to the parking lot. Pumping of the trench drain is required to prevent flooding of the adjacent shop. The Petro-Pipe is removed during winter months to prevent damage from inclement weather, snow removal, and vehicle traffic.
- **Asphalt Berming (Run-on Control):** Asphalt berms along Bikini Atoll Road and West Jemez Road prevents stormwater run-on to the site from adjacent roadways. An asphalt berm was installed around the outdoor metal storage yard in 2018, which includes berming at the west parking lots to minimize run-on from lots; and at the eastern side to reduce runoff coming from the metal storage yard.
- **Lids and Side Enclosures for Trash Dumpsters & Cardboard Recycle Bins:** Trash dumpsters and cardboard recycle bins (adjacent to the facility) are normally kept closed when not in use and dumped on a regular basis. Dumpsters will be kept in good condition and will be repaired or replaced if needed by Roads & Grounds.
- **Metalloxx Wattles:** Wattles are used to filter out metal residuals in stormwater runoff. There is currently a wattle located in the grated drain sump of Outfall 002 and at the SE corner of the metal storage yard. Other wattles may be added as needed.

3.1.2 Good Housekeeping

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

Site areas exposed to precipitation, including outfalls, are inspected during periodic walkdowns to ensure grounds are kept in orderly condition. Stormwater-critical items include floatable debris, garbage, waste, and other pollutant-carrying items.

West parking areas are swept to reduce sediment accumulation.

Areas around the Sternvent Cyclone and the wood shavings roll-off bin inspected and swept to keep wood dust and shavings from leaching into stormwater.

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

Outdoor wood and metal storage areas at the CS are monitored to ensure materials are stored properly off the ground on storage racks.

Outdoor metal storage areas at the MFS are monitored to ensure pipe is stored properly off the ground on storage racks, large scrap metal is elevated and stored on pallets or contained inside a recycling bin, and small scrap metal including shavings and turnings are contained inside a covered recycling bin.

Metal-recycling bins are equipped with lids and are monitored to ensure they are scheduled for pickup by the Material Recycling Facility (MRF) before they are too full.

Loading docks, storage sheds, vehicle loading and forklift parking areas inspected for signs of spills or leaks. Spills and leaks cleaned-up immediately. Government vehicles leaking fluid will be removed immediately and sent to the Heavy Equipment Shop for maintenance. Spill clean-up procedures will be followed as listed in Section 3.1.4 of this SWPPP.

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 Actions and Deadlines* requirements of Section 6.0 of this SWPPP.

Deficient items identified during monthly or other routine facility inspections will be documented on inspection forms and entered into the Corrective Action Report database. The CAR will remain open until proper maintenance or corrective action has been completed. CAR information along with documentation of maintenance/repair of control measures will be kept on file in Attachment 9 of the SWPPP.

3.1.4 Spill Prevention and Response

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

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, MicroBlaze or dry absorbents can be used and the contaminated absorbents disposed of properly.

The SEO or Facility Duty Officer shall report all spills or releases. All uncontrollable spills or releases must be reported to the SEO/EM&R Office or Facility Duty Officer by calling 667-6211 or, after hours, at 667-7080. 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, the SEO/EM&R Office will determine appropriate cleanup procedures and will notify the individuals or organizations responsible for completing spill reports or fulfilling regulatory reporting requirements.

Spills are reported to EPC-CP for documentation and reporting purposes. The completion of a spill report is required in the event of a spill. The spill 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 or written notification to the National Response Center, Environmental Protection Agency Region VI, or the New Mexico Environment Department (NMED). The determination for the type of reporting will be made by the SEO/EM&R Office, FOD and EPC-CP in accordance with Laboratory and DOE policies and federal and state regulatory reporting requirements. Copies of internal spill reports are maintained by the responsible organization.

The EPC-CP procedure for spill reporting and response, *ENV-CP-QP-007, Spill Investigations*, can be found in Attachment 20 of this SWPPP.

3.1.5 Erosion and Sediment Control

Carpentry Shop

The entire outside surface region associated with the CS is paved with asphalt and concrete; therefore, erosion and sediment transport from the site is unlikely. Areas to the south and southeast of the site are stabilized with rock. Sweeping of the west lot at the shop will generally be performed monthly except during winter months when weather conditions do not permit. Regular sweeping reduces sediment accumulation on site and transport of associated pollutants.

Metal Fabrication Shop

The entire outside surface region associated with the shop, except for small plots of grass adjacent to the buildings, is paved with asphalt and concrete; therefore, erosion and sediment transport is unlikely. An asphalt berm along Bikini Atoll Road and West Jemez Road prevents run-on to the shop’s lot from adjacent roadways. Sweeping of the west lot at the Facility will generally be performed except during winter months when weather conditions do not permit. Regular sweeping reduces sediment accumulation on site and transport of associated pollutants.

3.1.6 Management of Runoff

Carpentry Shop

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

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

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

Metal Fabrication Shop

The majority of stormwater runoff from outdoor activity areas at the facility is captured by one of 4 grated storm drains located on site. In the event of a stormwater backup at the grated (trench) drain west of the pipefitter's shop, a sump-pump will discharge stormwater inside the facility, along the north fence line and adjacent to West Jemez Road. This is necessary to prevent the pipefitter's shop from flooding.

Run-on from offsite parking flows east into the on-site grated storm drains, which are located on the west side of Building 38. As a result of grading modification, parking lot runoff does not impact the southwestern portion of the metal storage yard.

All subsurface drains are positioned correctly to capture stormwater runoff from all activity areas including metal storage, pipe storage, forklift, and vehicle parking. All subsurface drains are grated and inspected for obstruction during monthly inspections. All onsite and offsite storm drains at the facility connect to a common storm system and common outfall which daylights into a tributary of Sandia Canyon.

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

3.1.7 Salt Storage Piles or Piles Containing Salt

See Section 2.4.

3.1.8 Dust Generation and Vehicle Tracking of Industrial Materials

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

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

Metal cutting and fabrication activities take place inside in the MFS. Metal scrap and shavings are placed in a transfer bin located inside the shop before they are taken outdoors to metal scrap bins for recycling.

3.2 Numeric Effluent Limitations Based on Effluent Limitations Guidelines

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

Benchmark monitoring for Sectors A and AA is required at the shops and those sampling parameters are listed in Section 4.7 of this SWPPP.

3.3 Water Quality-based Effluent Limitations and Water Quality Standards

Stormwater from the TA-03-38 Shops 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.

4.0 SCHEDULES AND PROCEDURES

4.1 Good Housekeeping

See Section 3.1.2 of this SWPPP.

4.2 Maintenance

See Section 3.1.3 of this SWPPP.

4.3 Spill Prevention and Response

See Section 3.1.4 of this SWPPP.

4.4 Erosion and Sediment Control

See Section 3.1.5 of this SWPPP.

4.5 Employee Training

Employee training is essential to effective implementation of the SWPPP. The goals for the training program are to ensure that employees are more capable of preventing spills, responding safely and effectively to an accident when one occurs, and recognizing situations that could lead to stormwater contamination.

Per section 2.1.2.8 of the 2015 MSGP, training relevant to the SWPPP is required for all operational workers at the facility who work in areas where industrial materials or activities are exposed to stormwater (MSGP sites); 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 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 is conducted at least annually.

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 10 of this SWPPP.

The topics in this SWPPP that are covered in the latest version of LANL's training (ENV-CP-QAPP-MSGP, Stormwater Multi-Sector General Permit for Industrial Activities Program) include the following:

- Overview and goals of the SWPPP;
- 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 to be 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 will be conducted and documented monthly and per *ENV-RCRA-QP-022, MSGP Routine Facility Inspections* (Attachment 15).

Visual inspections are conducted in accordance with *EPC-CP-QP-064, MSGP Stormwater Visual Assessments* (Attachment 17).

4.6.1 Routine Facility Inspections

At least once each calendar year, the routine inspection will be conducted during a period when a stormwater discharge is occurring. The inspection will be performed by a qualified member of the Stormwater PPT (typically the DEP or EPC-CP Program Lead). 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/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 out 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 waste or 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.

The Stormwater PPT member performing the inspection will document the inspection and will note potential storm water pollution problems that were encountered on the routine facility inspection form. Any required corrective actions identified during the inspection will be 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 in between monthly routine inspections to further ensure compliance with the SWPPP. The routine inspection forms can be found in Attachment 7 of this SWPPP and meets the requirements listed in the 2015 MSGP (Section 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 sample and visual assessment must be collected and performed at each outfall. The visual assessment will be conducted by a qualified member of the Stormwater PPT (DEP or EPC-CP Technical Lead). The visual assessment must 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 practical thereafter. Or document why it was not possible to collect the sample within the first 30 minutes (i.e. adverse conditions, not enough flow, etc.)
- Conducted at least 72 hours since the last storm event; or document that the 72-hour period is representative of your local storm events during the sampling period.

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 snow melt discharge (taken during a measurable discharge from the site).

For facilities with significantly 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 outfall.

The Stormwater PPT member performing the visual assessment will document potential stormwater pollution problems that were observed during the assessment on the Quarterly Visual Assessment form (Attachment 8). Any required corrective actions identified during the assessment will be addressed in accordance with Section 6.0 *Corrective Actions and Deadlines* of this plan.

4.7 Monitoring

Analytical monitoring comprised of quarterly Benchmark and annual Impaired Waters monitoring will be performed on stormwater discharges from the sites. Monitoring events will be from storm events that result in an actual discharge from the site and that follow the preceding measurable storm event by at least 72 hours (3 days). For runoff from snowmelt, the monitoring will be performed at a time when a measurable discharge from the site occurs.

Monitoring will be conducted according to test procedures approved under 40 CFR Part 136. Runoff samples will be 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 will be collected as soon as practicable after the first 30 minutes and documentation will be kept with the SWPPP explaining why it was not possible to take samples within the first 30 minutes.

Benchmark monitoring will be performed quarterly in the period between April 1 and November 30. Impaired Waters monitoring will be performed on an annual basis with a sample collected during the same time period. Quarterly visual inspection/monitoring procedures are described in Section 4.6.2.

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 samples according to the relevant monitoring schedule, a substitute sample will be collected during the next qualifying storm event or as soon as practical.

Monitoring occurs at monitored **Outfall 074** at the CS; and at the automated sampling station **MSGP00201** (Outfall 002) at the MFS as described in Section 1.3. Discharge from the shops is east to 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 maps provided in Figures B-1.

Monitoring will continue quarterly for benchmark parameters and annually for constituents associated with impaired waters until that constituent is no longer detected in stormwater samples.

If the average of four monitoring values for any parameter does not exceed the benchmark, the monitoring requirements have been fulfilled for that specific parameter for the permit term.

If the average of the four monitoring values for any parameter exceeds the benchmark (or if prior to completion of 4 quarterly samples, an exceedance of the 4 quarter average is mathematically certain); or if the impaired water constituent exceeds the New Mexico Water Quality criterion, the Pollution Prevention Team and EPC-CP personnel 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 Section 6.2 of the 2015 MSGP).

For each monitoring event, except snowmelt monitoring, the following information will be recorded and maintained through field data sheets, 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
- Time (in days) since the previous measurable storm 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.

For snowmelt monitoring, all information except rainfall event durations, totals, and time since previous event will be included. Additionally, all records of monitoring information, including all calibration and maintenance records will be maintained for a minimum period of at least three years from the date the permit expires.

Quarterly Benchmark and annual Impaired Waters monitoring is required for the TA-03-38 Shops. The 2015 MSGP Sampling and Analysis Plan proposes that Outfall 074 and 002 be sampled for benchmark pollutants: total iron; and impaired water pollutants: aluminum, gross alpha, copper, thallium, and PCBs (Aroclors). The impaired water pollutants to be sampled can change yearly based on the requirements of the MSGP. The Sampling and Analysis plan will be updated each year.

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

EPC-CP-047, *Inspecting Stormwater Runoff Samplers and Retrieving Samples for the MSGP* (Attachment 18) and EPC-CP-048, *Processing MSGP Stormwater Samples* (Attachment 19).

The tables on the following pages lists the current Summary of Monitoring Requirements. The monitoring values have been modified to reflect New Mexico facility water quality standards and are based on the lowest water quality standards from the *Standards for Interstate and Intrastate Surface Waters* (as approved on June 5, 2013), 20.6.4.900 NMAC; and as set forth in section 9.6.2.1 of the 2015 MSGP.

Summary of Monitoring Requirements

Carpentry Shop – Outfall 074

Monitoring Requirement	Industrial Sector	Assessment Unit	Analyte	Filtered/ Unfiltered	Regulatory Standard	Units	Regulatory Standard Type	Regulatory Standard Reference
Impaired Waters	-	NM-9000.A_047	Total Aroclor	UF	0.2	ug/L	2007 EPA R6 MQL	20.6.4.900 NMAC Subpart J/ 20.6.4.12 NMAC Subpart E
Impaired Waters	-	NM-9000.A_047	Al	F10u ¹	1010	ug/L	NM 2010 Aquatic Chronic 80 mg	20.6.4.900 NMAC Subpart I
Impaired Waters	-	NM-9000.A_047	Cu	F ²	7	ug/L	NM 2010 Aquatic Chronic 80 mg	20.6.4.900 NMAC Subpart I
Impaired Waters	-	NM-9000.A_047	Temp	UF	24	°C	NM 2010 Aquatic Chronic	20.6.4.900 NMAC Subpart H (2)
Quarterly Benchmark	A	-	COD	UF	120	mg/L	MSGP QBM 2015	NMR050013 Sect 9.6.2.1
Quarterly Benchmark	A	-	TSS	UF	100	mg/L	MSGP QBM 2015	NMR050013 Sect 9.6.2.1

¹F10u – 10 µm filter

²F - 0.45 µm filter

Metal Fabrication Shop – Outfall 002

Monitoring Requirement	Industrial Sector	Assessment Unit	Analyte	Filtered/ Unfiltered	Regulatory Standard	Units	Regulatory Standard Type	Regulatory Standard Reference
Impaired Waters/ Quarterly Benchmark	AA	NM- 9000.A_047	Al	F10u ¹	1010	ug/L	NM 2010 Aquatic Chronic 80 mg	20.6.4.900 NMAC Subpart I
Impaired Waters	-	NM- 9000.A_047	Cu	F ²	7	ug/L	NM 2010 Aquatic Chronic 80 mg	20.6.4.900 NMAC Subpart I
Impaired Waters	-	NM- 9000.A_047	Temp	UF	24	°C	NM 2010 Aquatic Chronic	20.6.4.900 NMAC Subpart H (2)
Impaired Waters	-	NM- 9000.A_047	Total Aroclor	UF	0.2	ug/L	2007 EPA R6 MQL	20.6.4.900 NMAC Subpart J/ 20.6.4.12 NMAC Subpart E
Quarterly Benchmark	AA	-	Fe	UF	1000	ug/L	MSGP QBM 2015	NMR050013 Sect 9.6.2.1
Quarterly Benchmark	AA	-	NO ₃ +NO ₂ - N	UF	0.68	mg/L	MSGP QBM 2015	NMR050013 Sect 9.6.2.1
Quarterly Benchmark	AA	-	Zn	F	99	ug/L	NM 2010 Aquatic Chronic 80 mg	20.6.4.900 NMAC Subpart I

¹F10u – 10 µm filter

²F - 0.45 µm filter

5.0 DOCUMENTATION FOR ELIGIBILITY CONSIDERATIONS UNDER OTHER FEDERAL LAWS

5.1 Endangered Species

The Final Site-Wide Environmental Impact Statement 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 the 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.

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) will be reviewed and revised (as appropriate) so that the 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-storm water 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.

If any of the following conditions occur, a review of the selection, design, installation, and implementation of control measures will be 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).

If a review identifies any of the necessary modifications listed above, they will be performed following the corrective action process identified in Sections 6.1 - 6.3 below.

6.1 Immediate Actions

If a corrective action is required, immediate steps must be reasonably taken to minimize or prevent discharges from occurring (i.e. spill clean-up, scheduling repairs) until a permanent solution (if needed) can be implemented. Immediate action means all reasonable steps must be taken the same work day or no later than the following work day (when it is too late in the day to take corrective action).

6.2 Subsequent Actions

If further corrective actions are required (e.g. installing or making operational a new or modified control, completing repairs, ordering BMPs) they must be completed by the next storm event, if possible or within 14 calendar days (from initial discovery). If it is infeasible to complete corrective actions within 14 days, documentation of why it is infeasible must be provided in the SWPPP. This documentation must also include a timeframe and schedule for completion of the work, which must be completed no later

than 45 days (from initial discovery). If time needed to make corrective actions will exceed 45 days, EPA must be notified and provided a 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, required corrective actions will be documented by the DEP (or EPC-CP) and entered into the Corrective Action Database (CAR). The action will be kept open in the database until the issue has been resolved. Documentation of Maintenance and Repairs of Control Measures (BMPs) will be kept in Attachment 9 of this SWPPP. Where corrective actions result in changes to procedures or controls documented in this SWPPP, modifications to the SWPPP will be made accordingly within 14 days of completing the corrective action(s). LANL procedure, *EPC-CP-QP-022 MSGP Corrective Actions*, can be found in Attachment 16.

7.0 ACRONYMS

BMPs: Best Management Practices

CAR: Corrective Action Report

DO: Division Office

DEP: Deployed Environmental Professional

DESH: Deployed Environmental Safety and Health

EPC-CP: Environmental Protection and Compliance – Compliance Programs (Division)

FOD: Facilities Operations Directorate

MSGP: Multi Sector General Permit

NPDES: National Pollutant Discharge Elimination System

PPT: Pollution Prevention Team

SWPPP: Stormwater Pollution Prevention Plan

UI: Utilities and Institutional Facilities (Utilities Division)

8.0 SWPPP CERTIFICATION

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

CERTIFICATION STATEMENT

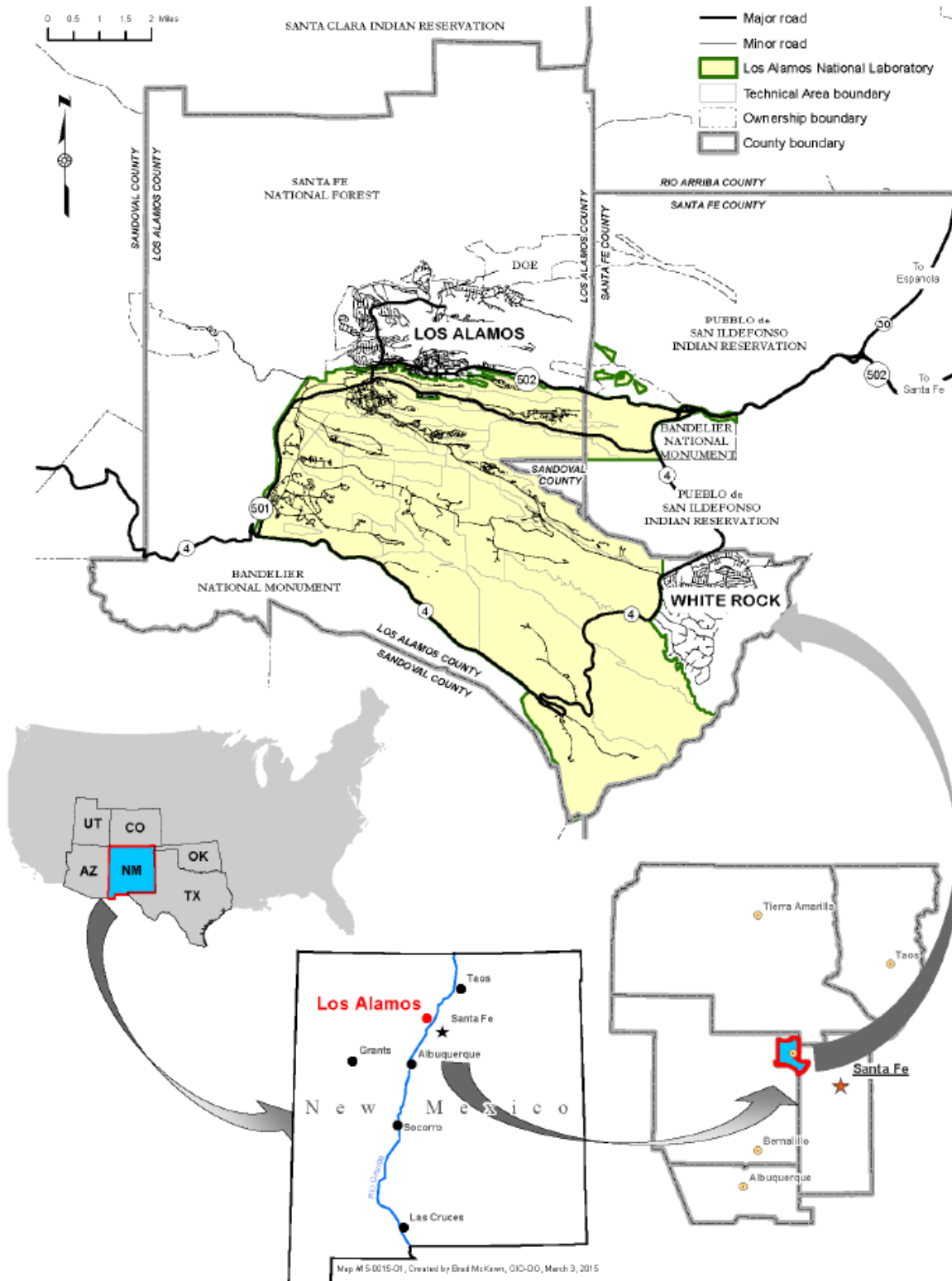
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage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

Signature  Digitally signed by ANDREW ERICKSON (Affiliate)
Date: 2019.01.30 08:42:19 -07'00'

Date _____

Andrew W. Erickson
Facility Operations Director
Utilities and Institutional Facilities

Figure A - General Location Map



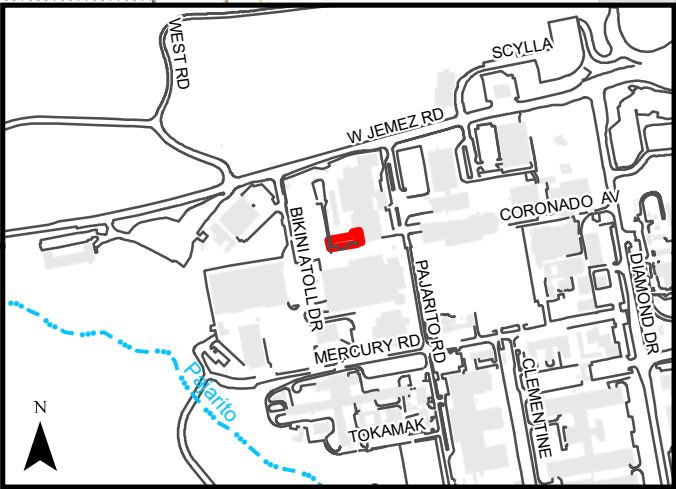
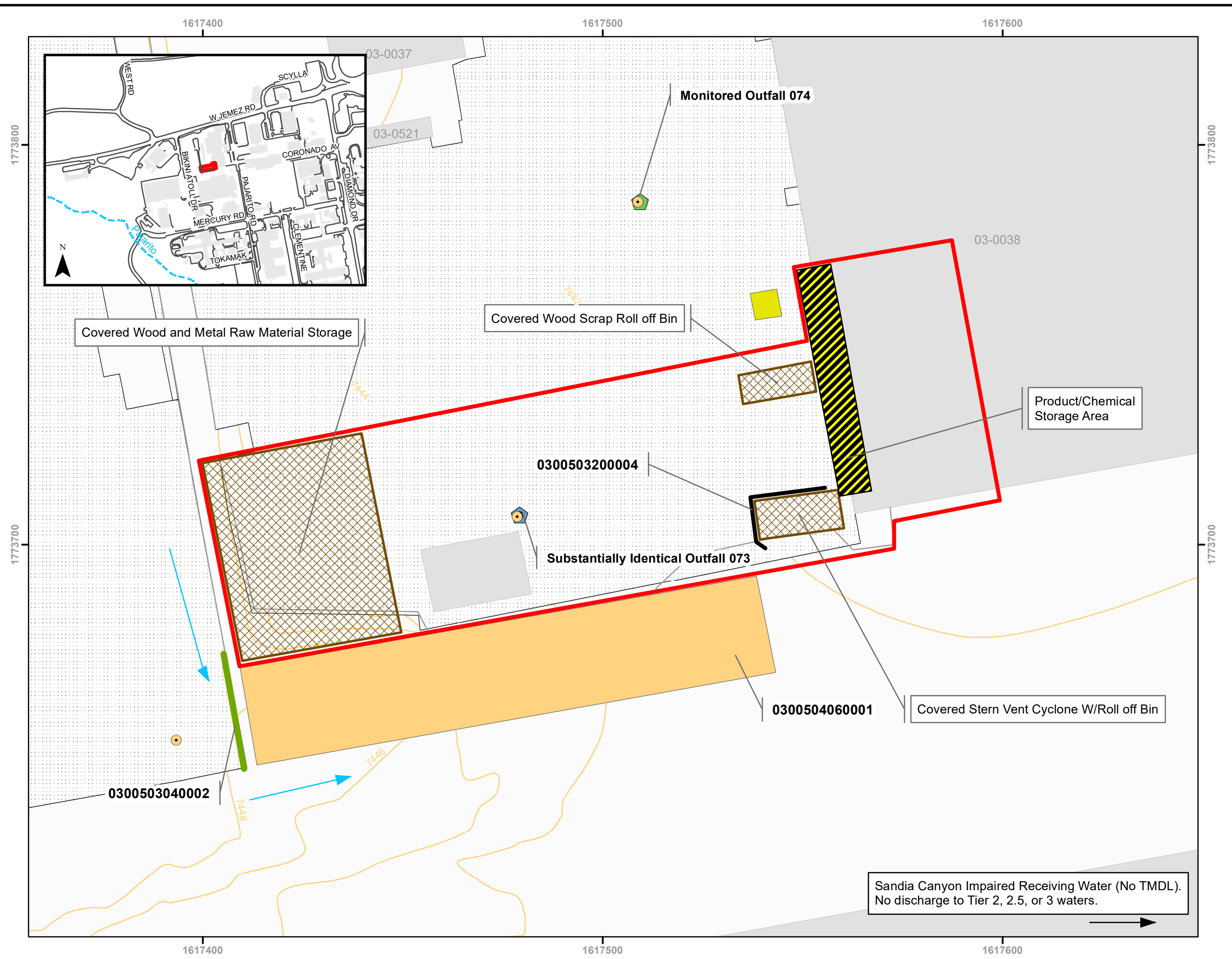
Map(s)

Figure B-1 Facility Site Map

Figure B-2 Nearby Receiving Waters

Figure B-3 LANL Endangered Species Map

TA-3-38 CARPENTER
SHOP SITE MAP
Figure B-1A



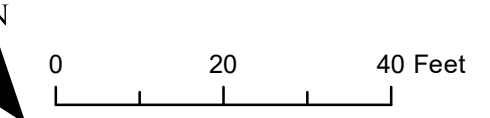
- Monitored Outfall
- Substantially Identical Outfall
- Drain Inlet
- Asphalt Berm
- EnviroSoxx w/ MetalLoxx
- Drainage
- Paved Roads
- 2 ft Contour
- Boundary of Industrial Activity
- Rip Rap
- Industrial Activity Areas
- Loading/Unloading Areas
- Dumpster
- LANL Structures
- Paved Parking Lot
- Flow Direction

0.25 Acres, 100% Impervious Surface.
Note - No Critical Habitat Areas.

Map number: 16-0015-TA-3-38-CarpenterShop
Map created by: Ben Sutter, IFPROG
Date: November 16, 2018
Version 5

New Mexico State Plane Coordinate System Central Zone (3002)
North American Datum, 1983 (NAD 83)
US Survey Ft

DISCLAIMER: This map was created for work processes associated with the Multi-Sector General Permit. All other uses for this map should be confirmed with LANL EPC-CP staff.



TA-3-38 METAL FAB SHOP SITE MAP FIGURE B-1B

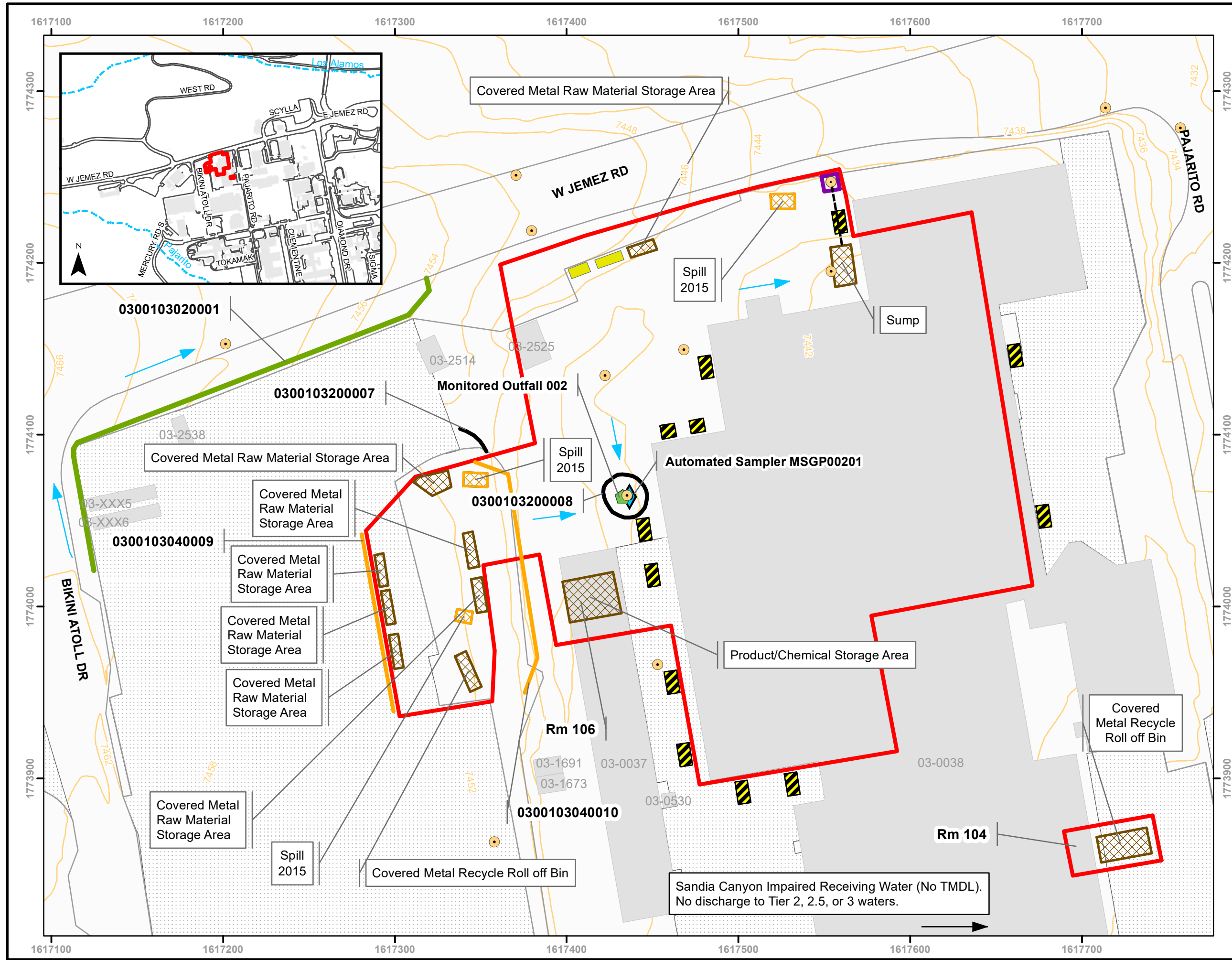
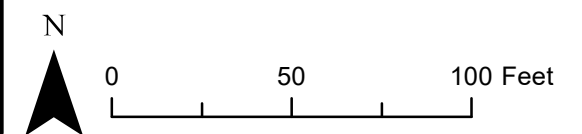
- Automated Sampler
- Monitored Outfall
- Drain Inlet
- Asphalt Berm
- Base Course Berm
- EnviroSoxx w/ MetalLoxx
- Paved Roads
- Drainage
- 2 ft Contour
- Boundary of Industrial Activity
- Petro Plug
- Industrial Activity Areas
- Spill 2015
- Dumpster
- Loading/Unloading Areas
- LANL Structures
- Paved Parking Lot
- Flow Direction
- Connection Pipe

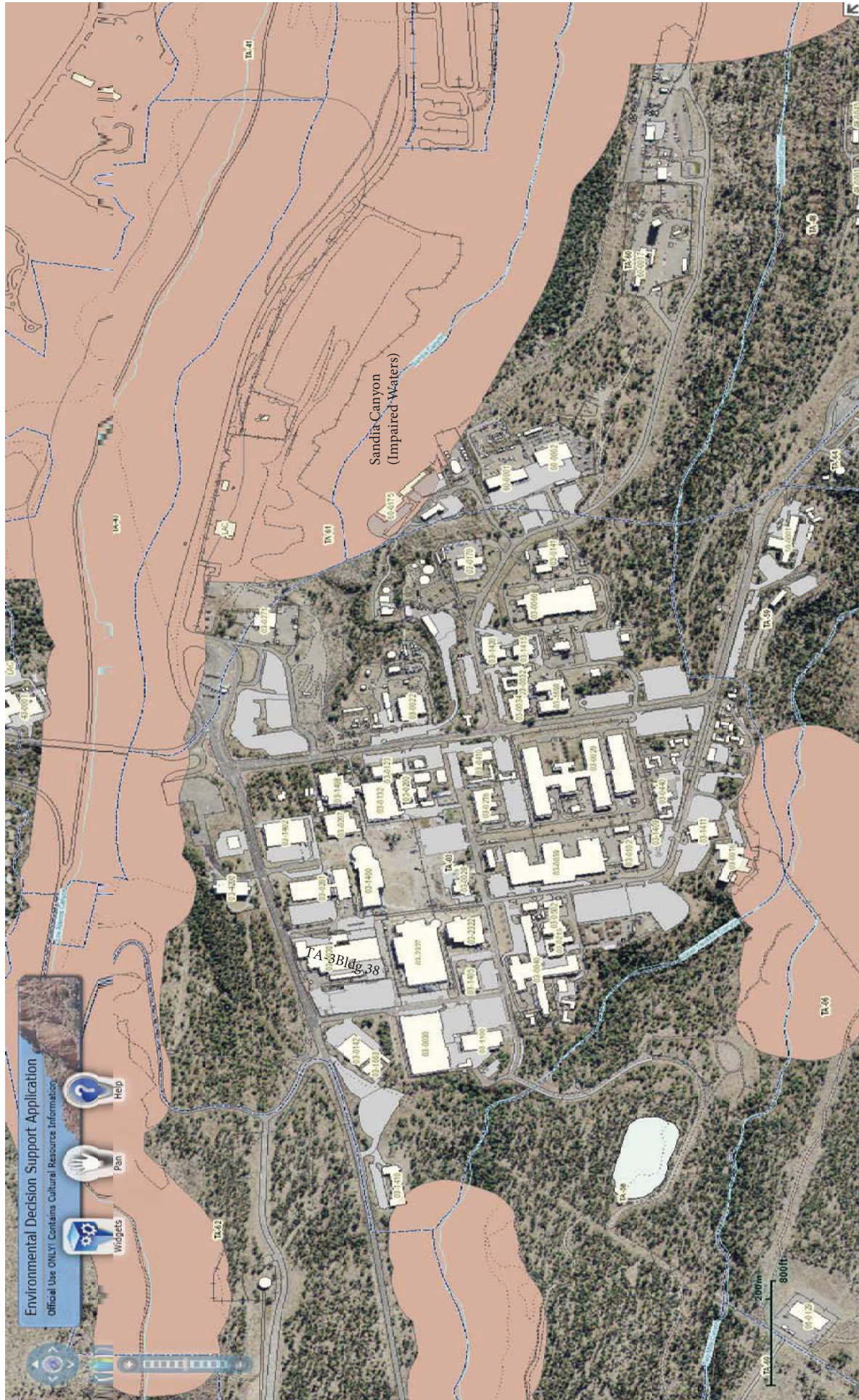
2 Acres, 100% Impervious Surface.
Note - No Critical Habitat Areas.

Map number: 16-0015-TA-03-38-Metals_Fab_Shop
Map created by: Ben Sutter, OI-FD
Date: October 12, 2018
Version 6

New Mexico State Plane Coordinate System Central Zone
(3002)
North American Datum, 1983 (NAD 83)
US Survey Ft

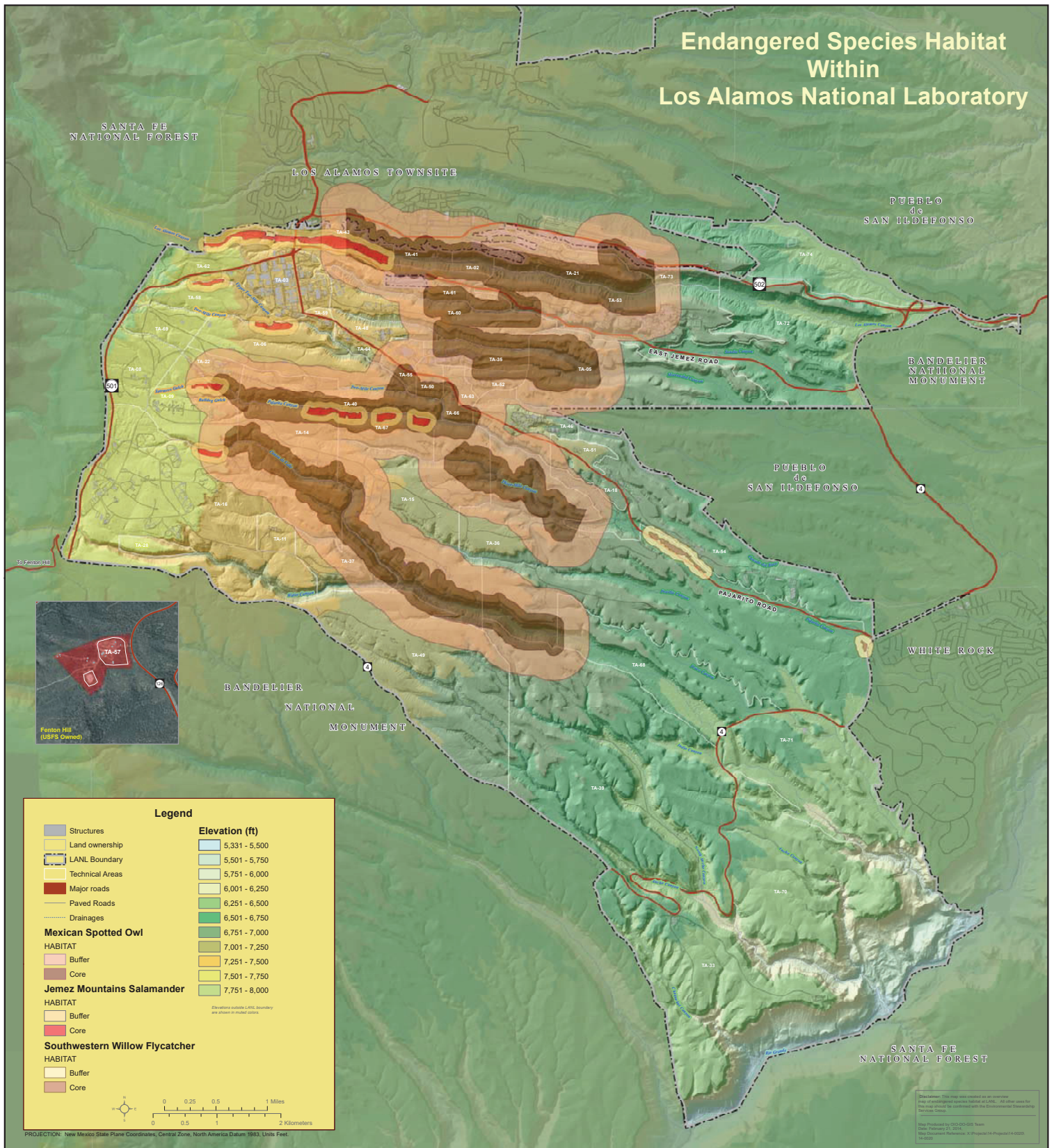
DISCLAIMER: This map was created for work processes associated with the Multi-Sector General Permit. All other uses for this map should be confirmed with LANL EPC-CP staff.





Peach Layer = Critical Habitat

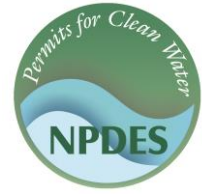
Figure B-3 Endangered Species Map



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



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



10/26/2018

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

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

NPDES ID: **NMR050013**

Dear Michael W. Hazen:

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

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

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

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

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

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

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

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

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

EPA Region 06

Name: **Nasim Jahan**

Phone: **(214) 665-7522**

Email: jahan.nasim@epa.gov

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

EPA NPDES eReporting Help Desk

Operated by Avanti Corporation

1200 Pennsylvania Ave., NW

Mail Code: 4203M

Washington, DC 20460

1-877-227-8965

Date: **OCT 01 2018**
Symbol: EPC-DO: 18-358
LA-UR: 18-29182
Locates Action No.: N/A

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

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

To Whom It May Concern:

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

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

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

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

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

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

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

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

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

Sincerely,



Michael W. Hazen
Associate Laboratory Director
Triad National Security, LLC

MWH:TWL:LJD:jdm

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

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

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

ENCLOSURE 1

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

EPC-DO: 18-358

LA-UR-18-29182

Date: **OCT 01 2018**

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

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

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

ENCLOSURE 2

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

EPC-DO: 18-358

LA-UR-18-29182

Date: **OCT 01 2018**

NPDES
FORM
3510-6UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460
NOTICE OF INTENT (NOI) FOR STORMWATER DISCHARGES ASSOCIATED WITH
INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMITForm 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 Form1. 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:

Nasim Jahan

Date approval obtained:

09 / 26 / 2018

* Note: You are required to obtain approval from the applicable EPA Regional Office prior to using this paper NOI form. If you have not obtained a waiver, you must file this form electronically using the NPDES eReporting Tool (Net) at <http://water.epa.gov/polwaste/npdes/stormwater/Stormwater-eNOI-System-for-EPA-MultiSector-General-Permit.cfm>

B. Permit Information

NPDES ID (EPA Use Only):

1. Master Permit Number: NMR050000 (see Appendix C of the MSGP for the list of eligible master permit numbers)

2. Are you a new discharger or a new source as defined in Appendix A? ☐ YES ☒ NO (If yes, skip to Part C of this form).

3. If you are not a new discharger or a new source, have stormwater discharges from your facility been covered previously under an NPDES permit?

☒ YES ☐ NO

If yes, provide the NPDES ID if you had coverage under EPA's 2008 MSGP or the NPDES ID if you had coverage under an EPA individual permit: Note: Facility had 2015 MSGP coverage under Permit ID NMR053195 with Los Alamos National Security, LLC as operator.

NMR05GB21

C. Facility Operator Information

1. Operator Information:

Operator Name: Triad National Security LLC

Mailing Address:

Street: PO Box 1663 MS K490

City: Los Alamos

State: NM ZIP Code: 87545 -

County or Similar Government Subdivision: Los Alamos

Phone: 505 - 665 - 2397 Ext.

E-mail: tlemke@lanl.gov

2. Operator Point of Contact Information:

First Name, Middle Initial, Last Name: Terrill W Lemke

Title: Environmental Manager

3. NOI Preparer Information (Complete if NOI was prepared by someone other than the certifier):

First Name, Middle Initial, Last Name: Holly L Wheeler

Organization: Triad National Security LLC

Phone: 505 - 667 - 1312 Ext.

E-mail: hbenison@lanl.gov

D. Facility Information1. Facility Name: **L o s A l a m o s N a t i o n a l L a b o r a t o r y**

2. Facility Address:

Street/Location: **P O B o x 1 6 6 3**City: **L o s A l a m o s**State: **N M**ZIP Code: **8 7 5 4 5**

County or Similar Government Subdivision:

L o s A l a m o s

3. Latitude/Longitude for the facility:

Latitude: **3 5 8 7 2 8** ° N (decimal degrees)Longitude: **1 0 6 3 2 1 1** ° W (decimal degrees)Latitude/Longitude Data Source: ☐ Map☐ GPS☒ Other

If you used a USGS topographic map, what was the scale? _____

Horizontal Reference Datum:

☐ NAD 27☐ NAD 83☒ WGS 844. 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 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 District7. Estimated area of industrial activity at your facility exposed to stormwater: **60.50** (to the nearest quarter acre)

8. Sector-Specific Information

NOTE: Sectors do not apply to every outfall. Refer to Section E.3 for Outfall-specific Sector associations.

Identify the 4-digit Standard Industrial Classification (SIC) code or 2-letter Activity Code that best represents the products produced or 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: **4 2 1 2** OR Primary Activity Code: Sector: **P** Subsector: **P 1**

Identify the applicable sector(s) and subsector(s) of any co-located industrial activity for which you are requesting permit coverage:

Sector: **A** Subsector: **A 4** Sector: **D** Subsector: **D 1** Sector: **F** Subsector: **F 4**Sector: **N** Subsector: **N 2** Sector: **O** Subsector: **O 1** Sector: **AA** Subsector: **AA 1****(Not NI)**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 ☐ NOIf you are a Sector G (Metal Mining) facility, do you have discharges from waste rock and overburden piles? ☐ YES ☐ NO

Check the type of ore you mine at your facility:

☐ Tungsten Ore☐ Nickel Ore☐ Aluminum Ore☐ Mercury Ore☐ Iron Ore☐ Platinum Ore☐ Titanium Ore☐ Vanadium Ore☐ Molybdenum☐ Uranium, Radium, and/or Vanadium Ore9. 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?

☒ YES☐ NO

If yes, which effluent limitation guidelines apply to your stormwater discharges?

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	<input type="checkbox"/>
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]	C	4/8/1974	<input type="checkbox"/>
Part 423	Coal pile runoff at steam electric generating facilities	O	11/19/1982 10/8/1974 ¹	<input type="checkbox"/>
Part 429, Subpart I	Discharges resulting from spray down or intentional wetting of logs at wet deck storage areas	A	1/26/1981	<input type="checkbox"/>
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	<input type="checkbox"/>
Part 443, Subpart A	Runoff from asphalt emulsion facilities	D	7/28/1975	<input checked="" type="checkbox"/>
Part 445, Subparts A & B	Runoff from hazardous waste and non-hazardous waste landfills	K, L	2/2/2000	<input type="checkbox"/>
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	<input type="checkbox"/>

¹NSPS promulgated in 1974 were not removed via the 1982 regulation; therefore wastewaters generated by Part 423-applicable sources that were New Sources under the 1974 regulations are subject to the 1974 NSPS.

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

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	002 (Sector AA, Subsector AA1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper, dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs]; 00010 Temperature, water deg. centigrade	TMDL Name and ID: N/A Pollutant(s) for which there is a TMDL: N/A
Latitude	35.875797			
Longitude	-106.327580			
Outfall ID	005 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper, dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs]; 00010 Temperature, water deg. centigrade	TMDL Name and ID: N/A Pollutant(s) for which there is a TMDL: N/A
Latitude	35.873919			
Longitude	-106.320746			

If substantially identical to other outfall, list identical outfall ID: _____

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

Outfall ID	010 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper, dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs]; 00010 Temperature, water deg. centigrade	TMDL Name and ID: N/A
Latitude	35.875402			Pollutant(s) for which there is a TMDL: N/A
Longitude	-106.320301			
If substantially identical to other outfall, list identical outfall ID: 009				
Outfall ID	012 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper, dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs]; 00010 Temperature, water deg. centigrade	TMDL Name and ID: N/A
Latitude	35.875532			Pollutant(s) for which there is a TMDL: N/A
Longitude	-106.320884			
If substantially identical to other outfall, list identical outfall ID:				
Outfall ID	011 (Sector O, Subsector O1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper, dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs]; 00010 Temperature, water deg. centigrade	TMDL Name and ID: N/A
Latitude	35.875563			Pollutant(s) for which there is a TMDL: N/A
Longitude	-106.320744			
If substantially identical to other outfall, list identical outfall ID: 012				
Outfall ID	017 (Sectors AA, F Subsectors AA1, F4)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper, dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs]; 00010 Temperature, water deg. centigrade	TMDL Name and ID: N/A
Latitude	35.872599			Pollutant(s) for which there is a TMDL: N/A
Longitude	-106.317066			
If substantially identical to other outfall, list identical outfall ID:				

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

Outfall ID	019 (Sectors AA, F Subsectors AA1, F4)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper, dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs]; 00010 Temperature, water deg. centigrade	TMDL Name and ID: N/A
Latitude	35.872682			Pollutant(s) for which there is a TMDL: N/A
Longitude	-106.318467			
If substantially identical to other outfall, list identical outfall ID: 017				
Outfall ID	020 (Sectors AA, F Subsectors AA1, F4)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper, dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs]; 00010 Temperature, water deg. centigrade	TMDL Name and ID: N/A
Latitude	35.872240			Pollutant(s) for which there is a TMDL: N/A
Longitude	-106.316340			
If substantially identical to other outfall, list identical outfall ID:				
Outfall ID	022 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper, dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs]; 00010 Temperature, water deg. centigrade	TMDL Name and ID: N/A
Latitude	35.872661			Pollutant(s) for which there is a TMDL: N/A
Longitude	-106.313691			
If substantially identical to other outfall, list identical outfall ID:				
Outfall ID	021 (Sector P, Subsector P1)	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	01104 Aluminum, total recoverable [as Al]; 01040 Copper, dissolved [as Cu]; 39516 Polychlorinated biphenyls [PCBs]; 00010 Temperature, water deg. centigrade	TMDL Name and ID: N/A
Latitude	35.872514			Pollutant(s) for which there is a TMDL: N/A
Longitude	-106.313562			
If substantially identical to other outfall, list identical outfall ID: 022				

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

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

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

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

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

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

4. Provide the following information about your outfall latitude longitude:

Latitude/Longitude Data Source: ☐ Map ☒ GPS ☐ Other

If you used a USGS topographic map, what was the scale? _____

Horizontal Reference Datum: ☐ NAD 27 ☒ NAD 83 ☐ WGS 84

5. Does your facility discharge into a Municipal Separate Storm Sewer System (MS4)? ☐ YES ☒ NO

If yes, provide the name of the MS4 operator: N/A

6. Check if you discharge to any of the waters of the U.S. that are designated by the state or tribal authority under its antidegradation policy as a Tier 2 (or Tier 2.5) water (water quality exceeds levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water) or as a Tier 3 water (Outstanding National Resource Water)? (See Appendix L).

☐ Tier 2/2.5. Provide the name(s) of receiving water(s): _____

☐ Tier 3 (Outstanding National Resource Waters)*

* **Note: You are ineligible for coverage if you are a new discharger or new source to waters designated as Tier 3 (outstanding national resource waters) for antidegradation purposes under 40 CFR 131.13(a)(3).**

7. If you are subject to benchmark monitoring requirements for a hardness-dependent metal, what is the hardness of your receiving water(s) (see Appendix J)? 82 (mg/L)

8. If you are subject to benchmark monitoring requirements for a hardness-dependent metal, does your facility discharge into any saltwater receiving waters? ☐ YES ☒ NO

9. Does your facility discharge to a federal CERCLA site listed in Appendix P? ☐ YES ☒ NO

If yes, did you notify the EPA Regional Office in advance of filing your NOI, and did the EPA Regional Office determine that you are eligible for permit coverage pursuant to Part 1.1.4.10*? ☐ YES ☐ NO

* **Note: If you discharge to a federal CERCLA site listed in Appendix P, you are ineligible for coverage under this permit unless you notify the EPA Regional Office in advance and the EPA Regional Office determines you are eligible coverage under this permit. In determining your eligibility for coverage under this Part, the EPA Regional Office may evaluate whether you have included adequate controls and/or procedures to ensure that your discharges will not lead to recontamination of aquatic media at the CERCLA Site such that it will to cause or contribute to an exceedance of a water quality standard.**

F. Stormwater Pollution Prevention Plan (SWPPP) Information

1. Has the SWPPP been prepared in advance of filing this NOI, as required? ☒ YES ☐ NO

2. SWPPP Contact Information:

First Name, Middle Initial, Last Name: Holly L Wheeler

Professional Title: Environmental Professional

Phone: 505-667-1312 Ext.

E-mail: hbenson@lanl.gov

3. SWPPP Availability:

Your current SWPPP or certain information from your SWPPP must be made available through one of the following two options. Select one of the options and provide the required information*:

* **Note: You are not required to post any confidential business information (CBI) or restricted information (as defined in Appendix A) (such information may be redacted), but you must clearly identify those portions of the SWPPP that are being withheld from public access.**

☒ **Option 1:** Maintain a current copy of your SWPPP on an Internet page (Universal Resource Locator or URL).

Provide the web address URL: eprr.lanl.gov

☐ **Option 2:** Provide the following information from your SWPPP:

A. Describe your onsite industrial activities exposed to stormwater (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams), and potential spill and leak areas:

B. List the pollutant(s) or pollutant constituent(s) associated with each industrial activity exposed to stormwater that could be discharged in stormwater and 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 maintenance (see Part 5.2.5.1) and a schedule for all inspections required in Part 4 (see Part 5.2.5.2):

G. Endangered Species Protection

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 effects on listed species and critical habitat.**

2. Provide a brief summary of the basis for the criterion selected in Appendix E (e.g., communication with U.S. Fish and Wildlife Service or National Marine Fisheries Service to determine no species in action area; implementation of controls approved by EPA and the Services):

Direct consultation with the U.S. Fish and Wildlife Service and corresponding development and implementation of a facility-specific Habitat Management Plan.

3. If you select criterion B, provide the NPDES ID from the other operator's NOI authorized under this permit:

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4. If you select criterion C, you must answer the following questions:

a. What federally-listed species or designated critical habitat are located in your "action area":

b. Using the Appendix E worksheet, check which of the following is applicable to your facility and answer any corresponding questions:

☐ I submitted my completed *Criterion C Eligibility Form* to EPA at least 30 days prior to submitting this NOI and agree to implement any additional measures that were determined by EPA to be necessary to ensure that my discharges and/or discharge-related activities will not have likely adverse effects on listed species and critical habitat.

Date your *Criterion C Eligibility Form* was sent to EPA:

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Describe any EPA-approved measures you will implement to ensure no likely adverse effects on listed species and critical habitat:

☐ I submitted my completed *Criterion C Eligibility Form* to EPA at least 30 days prior to submitting this NOI and have not been notified of any additional measures necessary to ensure no likely adverse effects on listed species and critical habitat.

Date your *Criterion C Eligibility Form* was sent to EPA:

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5. If you select criterion D or E, you must attach copies of any letters or other communications with the U.S. Fish and Wildlife Service or National Marine Fisheries Service.

H. Historic Preservation

1. If your facility is not located on Indian country lands, is your facility located on a property of religious or cultural significance to an Indian tribe?

☒ YES ☐ NO

If yes, provide the name of the Indian tribe associated with the property: San Ildefonso Pueblo

2. Using the instructions in Appendix F of the MSGP, under which historic properties preservation criterion listed in Part 1.1.4.6 are you eligible for coverage under this permit (only check 1 box)?

☐ A ☒ B ☐ C ☐ D

I. Certification Information

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

First Name, Middle Initial, Last Name: Michael W Hazen

Title: Associate Laboratory Director

Signature: 

Date: 10 / 01 / 2018

E-mail: mhzazn@lanl.gov

ENCLOSURE 3

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

EPC-DO: 18-358

LA-UR-18-29182

Date: **OCT 01 2018**

							ELG, Modified Benchmark, and Impaired Waters Limits per MSGP Section 9.6.2 and the NM Water Quality Standards (20.6.4.900 NMAC [New Mexico Administrative Code])										
Permit ID	Facility	Permitted Feature	Sector(s)	Subsector	Proposed Consolidated Discharge # (Limit Set)	Discharge Description	Parameter Code	Parameter Name	Symbol	Quality Value	Limit Type	Units	Freq. of Analysis	Smpl. Type	Monitoring Period Start Date	Monitoring Period End Date	DMR Due Date
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68	Maximum	mg/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=	99	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68	Maximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=	99	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68	Maximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=	99	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	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	11/30/2019
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68	Maximum	mg/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	002	AA	AA1	002-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=	99	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	002	AA	AA1	002-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	002	AA	AA1	002-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
TBD	Los Alamos National Laboratory	002	AA	AA1	002-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
							00010 1 0	Temperature, water deg. centigrade	<=	24	Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	005	O	O1	005-O1	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	005	O	O1	005-O1	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	005	O	O1	005-O1	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	005	O	O1	005-O1	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
TBD	Los Alamos National Laboratory	005	O	O1	005-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	005	O	O1	005-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
TBD	Los Alamos National Laboratory	005	O	O1	005-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
TBD	Los Alamos National Laboratory	005	O	O1	005-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
							00010 1 0	Temperature, water deg. centigrade	<=	24	Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	009	O	O1	009-O1	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	009	O	O1	009-O1	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	009	O	O1	009-O1	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	009	O	O1	009-O1	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
TBD	Los Alamos National Laboratory	009	O	O1	009-IW	IW - Impaired Water	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	009	O	O1	009-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	009	O	O1	009-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=	7	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	009	O	O1	009-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=	7	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	009	O	O1	009-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=	0.2	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
							00010 1 0	Temperature, water deg. centigrade	<=	24	Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	012	O	O1	012-O1	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	012	O	O1	012-O1	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	012	O	O1	012-O1	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	012	O	O1	012-O1	O1 - Steam Electric Generating Facilities	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
TBD	Los Alamos National Laboratory	012	O	O1	012-IW	IW - Impaired Water	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
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TBD	Los Alamos National Laboratory	012	O	O1	012-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
TBD	Los Alamos National Laboratory	012	O	O1	012-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
TBD	Los Alamos National Laboratory	012	O	O1	012-IW	IW - Impaired Water	39516 1 0	Polychlorinated biphenyls [PCBs]	<=	0.2	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
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TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
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TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68	Maximum	mg/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=	99	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019

Permit ID	Facility	Permitted Feature	Sector(s)	Subsector	Proposed Consolidated Discharge # (Limit Set)	Discharge Description	ELG, Modified Benchmark, and Impaired Waters Limits per MSGP Section 9.6.2 and the NM Water Quality Standards (20.6.4.900 NMAC [New Mexico Administrative Code])										
							Parameter Code	Parameter Name	Symbol	Quality Value	Limit Type	Units	Freq. of Analysis	Smpl. Type	Monitoring Period Start Date	Monitoring Period End Date	DMR Due Date
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as Cu]	<=	7	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68	Maximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=	99	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as Cu]	<=	7	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
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TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68	Maximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=	99	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as Cu]	<=	7	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68	Maximum	mg/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=	99	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-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
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-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
TBD	Los Alamos National Laboratory	017	AA, F	AA1, F4	017-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
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as Cu]	<=	7	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68	Maximum	mg/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=	99	Maximum	ug/L	1/60	Gr	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as Cu]	<=	7	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68	Maximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=	99	Maximum	ug/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as Cu]	<=	7	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68	Maximum	mg/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=	99	Maximum	ug/L	1/60	Gr	8/1/2019	9/30/2019	11/30/2019
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01040 1 0	Copper, dissolved [as Cu]	<=	7	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01045 1 0	Iron, total [as Fe]	<=	1000	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	51450 1 0	Nitrite Plus Nitrate Total	<=	0.68	Maximum	mg/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-11	11- Fabricated Metal Products, except Coating	01090 1 0	Zinc, dissolved [as Zn]	<=	99	Maximum	ug/L	1/60	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-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
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-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
TBD	Los Alamos National Laboratory	020	AA, F	AA1, F4	020-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
TBD	Los Alamos National Laboratory	022	P	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
TBD	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
TBD	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
TBD	Los Alamos National Laboratory	022	P	P1	022-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
TBD	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
TBD	Los Alamos National Laboratory	026	P	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
TBD	Los Alamos National Laboratory	026	P	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

Permit ID	Facility	Permitted Feature	Sector(s)	Subsector	Proposed Consolidated Discharge # (Limit Set)	Discharge Description	ELG, Modified Benchmark, and Impaired Waters Limits per MSGP Section 9.6.2 and the NM Water Quality Standards (20.6.4.900 NMAC [New Mexico Administrative Code])										
							Parameter Code	Parameter Name	Symbol	Quality Value	Limit Type	Units	Freq. of Analysis	Smpl. Type	Monitoring Period Start Date	Monitoring Period End Date	DMR Due Date
TBD	Los Alamos National Laboratory	026	P	P1	026-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
TBD	Los Alamos National Laboratory	029	N	N2	029-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	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
TBD	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
TBD	Los Alamos National Laboratory	029	N	N2	029-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
TBD	Los Alamos National Laboratory	031	P	P1	031-IW	IW - Impaired Water	51931 1 0	Adjusted Gross Alpha	<=	15	Maximum	pCi/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	031	P	P1	031-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=	11	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	031	P	P1	031-IW	IW - Impaired Water	71900 1 0	Mercury, total [as Hg]	<=	0.77	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	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
TBD	Los Alamos National Laboratory	032	P	P1	032-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	032	P	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
TBD	Los Alamos National Laboratory	032	P	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
TBD	Los Alamos National Laboratory	032	P	P1	032-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
TBD	Los Alamos National Laboratory	036	P	P1	036-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
TBD	Los Alamos National Laboratory	036	P	P1	036-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
TBD	Los Alamos National Laboratory	036	P	P1	036-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
TBD	Los Alamos National Laboratory	036	P	P1	036-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
TBD	Los Alamos National Laboratory	039	P	P1	039-IW	IW - Impaired Water	01104 1 0	Aluminum, total recoverable [as Al]	<=	1010	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	039	P	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
TBD	Los Alamos National Laboratory	039	P	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
TBD	Los Alamos National Laboratory	039	P	P1	039-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
TBD	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
TBD	Los Alamos National Laboratory	042	P	P1	042-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
TBD	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
TBD	Los Alamos National Laboratory	042	P	P1	042-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
TBD	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
TBD	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	6/1/2019	7/31/2019	9/30/2019
TBD	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	8/1/2019	9/30/2019	11/30/2019
TBD	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	10/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	043	D	D1	043-1D	1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing	00556 1 0	Oil & Grease	<=	10	30-Day Average	mg/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	043	D	D1	043-1D	1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing	00556 1 0	Oil & Grease	<=	15	Daily Maximum	mg/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	043	D	D1	043-1D	1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing	00400 1 0	pH	>=	6	Minimum	SU	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	043	D	D1	043-1D	1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing	00400 1 0	pH	<=	9	Maximum	SU	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	043	D	D1	043-1D	1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing	00530 1 0	Solids, total suspended	<=	15	30-Day Average	mg/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	043	D	D1	043-1D	1D - Asphalt Paving and Roofing Materials and Lubricant Manufacturing	00530 1 0	Solids, total suspended	<=	23	Daily Maximum	mg/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	043	D	D1	043-IW	IW - Impaired Water	51931 1 0	Adjusted Gross Alpha	<=	15	Maximum	pCi/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020

							ELG, Modified Benchmark, and Impaired Waters Limits per MSGP Section 9.6.2 and the NM Water Quality Standards (20.6.4.900 NMAC [New Mexico Administrative Code])										
Permit ID	Facility	Permitted Feature	Sector(s)	Subsector	Proposed Consolidated Discharge # (Limit Set)	Discharge Description	Parameter Code	Parameter Name	Symbol	Quality Value	Limit Type	Units	Freq. of Analysis	Smpl. Type	Monitoring Period Start Date	Monitoring Period End Date	DMR Due Date
TBD	Los Alamos National Laboratory	043	D	D1	043-IW	IW - Impaired Water	01040 1 0	Copper, dissolved [as Cu]	<=	11	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	043	D	D1	043-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
TBD	Los Alamos National Laboratory	043	D	D1	043-IW	IW - Impaired Water	71900 1 0	Mercury, total [as Hg]	<=	0.77	Maximum	ug/L	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	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	7/31/2019
TBD	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	4/1/2019	5/31/2019	7/31/2019
TBD	Los Alamos National Laboratory	074	A	A4	074-A4	A4 - Hardwood Dimension and Flooring Mills	81017 1 0	Chemical Oxygen Demand [COD]	<=	120	Maximum	mg/L	1/60	Gr	6/1/2019	7/31/2019	9/30/2019
TBD	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	6/1/2019	7/31/2019	9/30/2019
TBD	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	8/1/2019	9/30/2019	11/30/2019
TBD	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
TBD	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	10/1/2019	11/30/2019	1/31/2020
TBD	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
TBD	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
TBD	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
TBD	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
							00010 1 0	Temperature, water deg. centigrade	<=	24	Maximum	deg C	1/YR	Gr	4/1/2019	11/30/2019	1/31/2020
TBD	Los Alamos National Laboratory	075	P	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
TBD	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
TBD	Los Alamos National Laboratory	075	P	P1	075-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
TBD	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

ENCLOSURE 4

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

EPC-DO: 18-358

LA-UR-18-29182

Date: **OCT 01 2018**



United States Department of the Interior

FISH AND WILDLIFE SERVICE

New Mexico Ecological Services Field Office
2105 Osuna NE

Albuquerque, New Mexico 87113
Phone: (505) 346-2525 Fax: (505) 346-2542

February 12, 1999

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

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

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

Dear Mr. Gurule:

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

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

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

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

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

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

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

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

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

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

David A. Gurule, Acting Area Manager

4

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

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

Sincerely,



Jennifer Fowler-Propst
Field Supervisor

cc:

Teralene Foxx, Project Manager, Ecology Group, Los Alamos National Laboratory,
P.O. Box 1663, Mail Stop M887, Los Alamos, New Mexico 87545
Elizabeth Withers, U.S. Department of Energy, Los Alamos Area Office, 35th Street, Los
Alamos, New Mexico
Field Supervisor, Ecological Services, U.S. Fish and Wildlife Service, Phoenix,
Arizona



United States Department of the Interior

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

December 9, 2013

Cons. #02ENNM00-2014-I-0014

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

Dear Mr. Beausoleil:

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

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

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

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

Fuels Management Practices to Reduce Wildfire Risk

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

Utility Corridors

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


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

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

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

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

Sincerely,


Wally Murphy
Field Supervisor

cc:

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



United States Department of the Interior



FISH AND WILDLIFE SERVICE

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

August 6, 2015

Cons. # 02ENNM00-2015-I-0538

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

Dear Ms. Lebak:

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

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

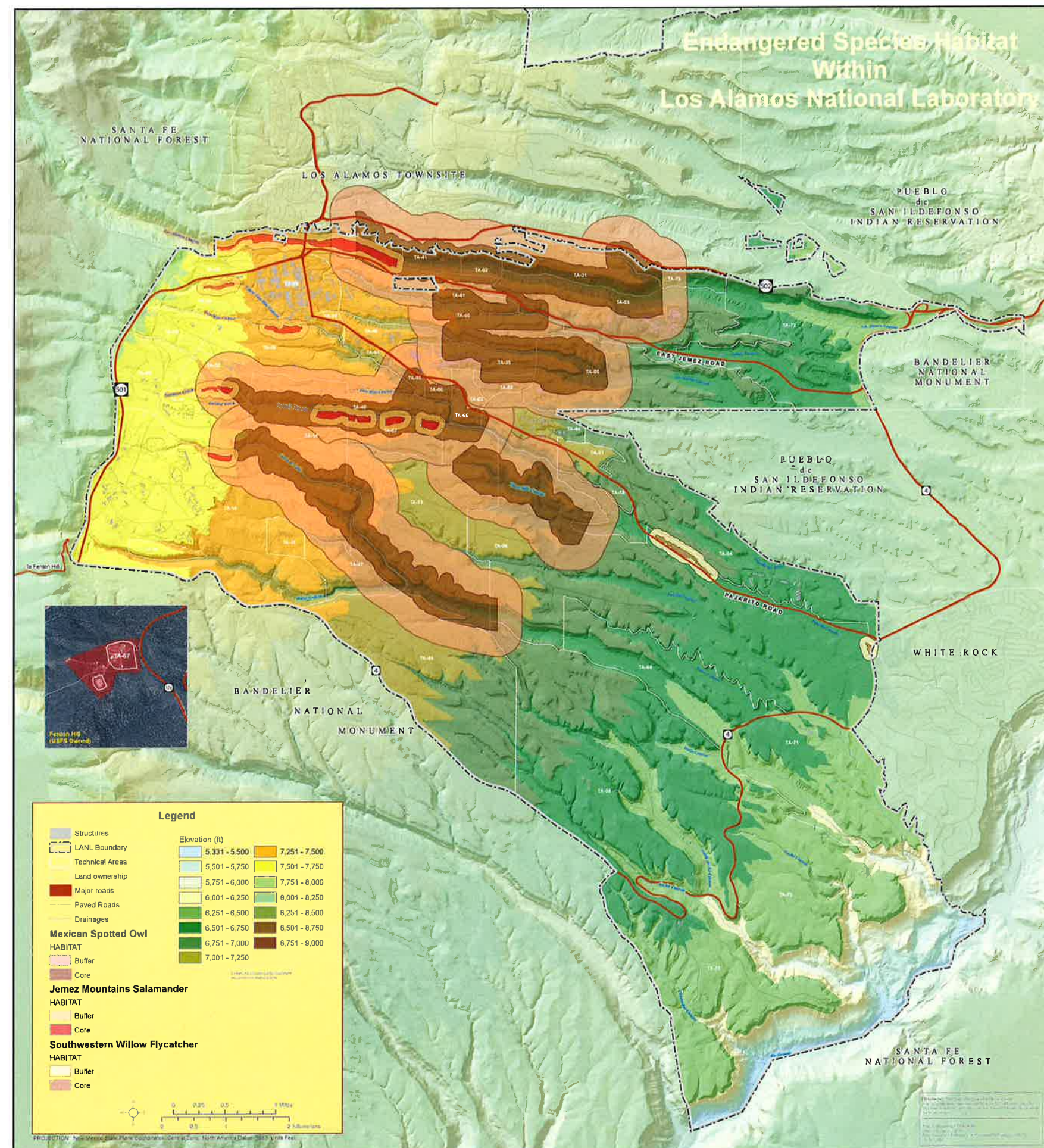
Thank you for your concern for endangered species and New Mexico's wildlife habitats. If you have any questions, please contact Eric Hein of my staff at the letterhead address or at (505) 761-4735.

Sincerely,

for Wally Murphy
Field Supervisor

cc:

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






ATTACHMENT 2: SWPPP AMENDMENTS

Date	Plan Section	Reason for Amendment	Amendment
Jan 2019	All	New MSGP Plan for new Laboratory Contract.	New MSGP Plan for Triad, LLC (replacing LANS, LLC.

ATTACHMENT 3: CERTIFICATION OF NO UNAUTHORIZED STORMWATER DISCHARGES

Unauthorized Non-Storm Water Discharge Assessment and Certification

Facility:	TA-03-38 Carpentry & Metal Fabrication Shop		
Outfalls (including SIOs*) or Other Onsite Drainage Points Observed During the Assessment	Identified Potential Sources of Unauthorized Non-Storm Water Discharge (if applicable)	Description of Assessment Criterion Used	Describe any Required Actions to Control or Eliminate the Discharge
MFS: 002	None	Visual Inspection	N/A
CS: 074 (073)	None	Visual Inspection	N/A
Assessor:			
Print Name: Jillian E. Burgin	Signature: 	Title: DEP, CISEC	Date Assessed: 12/18/18
Authorized Signatory: 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.			
Print Name: 	Signature: 	Title: ESH Mgr 4 OESH- UES	Date Certified: 1/25/2019

*SIO = Substantially Identical Outfall

ATTACHMENT 4: DULY AUTHORIZED SIGNATORY MEMORANDUM



***Environmental Protection & Compliance
Division***

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

Symbol: EPC-DO: 18-453
LAUR: 18-31574
Date: **DEC 11 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 Intent (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:

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)

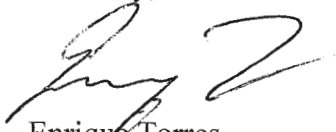
- Positions listed as primary signatory officials above.
- Group Leader or Team Leaders within the Environmental Compliance Programs Group.
- Division Leader, Deputy Division Leader, or Group Leader of the LANL division responsible for the overall operation of the regulated facility or activity.
- Responsible 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

Attachment(s): None.

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

ATTACHMENT 5: DISCHARGE MONITORING REPORTS

Since Triad, LLC took over the operating contract after the monitoring period for 2018, DMRs for 2018 will be kept on file in the archived SWPPP for LANS, LLC.

ATTACHMENT 6: ANNUAL REPORTS

The 2018 Annual Report will be submitted to EPA on January 30, 2019. A hard copy will be kept on file with the SWPPP.

ATTACHMENT 7: ROUTINE FACILITY INSPECTIONS

Los Alamos National Lab - ADESH

Work Order MSGP-RI-63345

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

Maintenance Details

Requested: 10/29/2018 10:35:36 AM
Procedure: MSGP Routine Facility Inspection (EPC-CP-Form-1020.1)

Target: 11/30/2018
Priority/Type: Normal / Inspection
Department: Utilities and Infrastructure

MSGP Program
RG121.9
TA-3-38 Carpenter Shop

Last PM: 9/27/2018
Project: Routine Facility Inspections
Nov. 2018 (P-MSGP-RI-5346)

Contact:
Phone:

Reason: 2018 November Inspections

Special Instructions: NMR053195

*Insap done
11/30/18
10:30 - 10:45 AM*

Tasks

#	Description	Meas.	No	N/A	Yes
Weather Information					
20	Describe the weather at time of inspection and document the temperature (F°).	40° cloudy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Within the Facility Boundary					
40	Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
50	If "No" has a CAR been previously initiated for this new discharge?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
60	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Outfall Inspection (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comment)					
90	Monitored Outfall [073] Free of Evidence of Erosion? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
100	Monitored Outfall [073] Flow Dissipation Devices Operating Effectively? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
110	Monitored Outfall [073] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
120	Substantially Identical Outfall [074] Free of Evidence of Erosion? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
130	Substantially Identical Outfall [074] Flow Dissipation Devices Operating Effectively? If "No", describe.		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
140	Substantially Identical Outfall [074] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Control Measures (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comments).					
160	Asphalt Berm [0300503040002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
170	Rip Rap [0300504060001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
180	EnviroSoxx w/ MetalLoxx [0300503200004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Area/Activity exposed to stormwater (identify needed maintenance or a description of corrective actions in relevant task comment).					
200	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
210	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
220	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

230	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
240	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
250	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
260	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
270	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
280	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
290	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
300	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
310	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
320	Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
330	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
340	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
350	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
360	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
370	Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Non-Compliance

390	Free of incidents of observed non-compliance not already identified above? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Additional Control Measures

410	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Labor

Labor	Assigned	Work Date	Reg Hrs	OT Hrs	Other Hrs
Burgin, Jillian	11/1/2018 / 1				

Labor Report

Completed: _____

Report: _____

WO ID: msop: R1-63345 Page 2 of 3

Name/Z#: Jillian Burgin / 211081

Signature (lead inspector): DEP/ [Signature], CISEC Date and Time: 11/30/18

10:45 AM

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

CERTIFICATION STATEMENT

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

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

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

Signature: [Signature] Date: 12/14/2018

Los Alamos National Lab - ADESH

Work Order MSGP-RI-63445

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

Maintenance Details

Requested: 12/17/2018 4:33:24 PM
Procedure: MSGP Routine Facility Inspection (EPC-CP-Form-1020.1)
Last PM: 11/30/2018
Project: Routine Facility Inspections Dec. 2018 (P-MSGP-RI-5353)
Reason: 2018 December Inspections

Target: 12/31/2018
Priority/Type: Normal / Inspection
Department: Utilities and Infrastructure

MSGP Program
RG121.9
TA-3-38 Carpenter Shop

Contact:
Phone:

*Inspection done
12/18/18
2:40 - 3:00 PM*

Tasks

#	Description	Meas.	No	N/A	Yes
Weather Information					
20	Describe the weather at time of inspection and document the temperature (F°).	47° F	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Within the Facility Boundary					
40	Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
50	If "No" has a CAR been previously initiated for this new discharge?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
60	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Outfall Inspection (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comment)					
90	Monitored Outfall [073] Free of Evidence of Erosion? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
100	Monitored Outfall [073] Flow Dissipation Devices Operating Effectively? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
110	Monitored Outfall [073] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
120	Substantially Identical Outfall [074] Free of Evidence of Erosion? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
130	Substantially Identical Outfall [074] Flow Dissipation Devices Operating Effectively? If "No", describe.		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
140	Substantially Identical Outfall [074] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Control Measures (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comments)					
160	Asphalt Berm [0300503040002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
170	Rip Rap [0300504060001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
180	EnviroSoxx w/ MetalLoxx [0300503200004] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Area/Activity exposed to stormwater (identify needed maintenance or a description of corrective actions in relevant task comment)					
200	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
210	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
220	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
230	Liquid tank storage/secondary containment: controls adequate (appropriate, effective,		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	and operating)? If "No" describe.			
240	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
250	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
260	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
270	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
280	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
290	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
300	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
310	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
320	Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
330	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
340	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
350	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
360	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
370	Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Non-Compliance				
390	Free of incidents of observed non-compliance not already identified above? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Additional Control Measures				
410	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Labor

Labor	Assigned	Work Date	Reg Hrs	OT Hrs	Other Hrs
Burgin, Jillian	12/17/2018 / 1				
Wheeler, Holly	12/17/2018 / 1				

Labor Report

Completed: _____

Report:

WO ID: MSOP-RI-63445 Page 2 of 3

Name/Z#: Jillian Burgin / 24081 for
Holly Wheeler / 118432

Signature (lead inspector): JPaugm, CSEC/DEP Date and Time: 12/18/18

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

3:00 pm

CERTIFICATION STATEMENT

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

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

Print name and title: Russell Stone GL DESH-UTS

Signature: Russell Stone Date: 1/11/2019

Los Alamos National Lab - ADESH

Work Order MSGP-RI-63346

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

Maintenance Details

Requested: 11/6/2018 2:36:00 PM
Procedure: MSGP Routine Facility Inspection (EPC-CP-Form-1020.1)

Target: 11/30/2018
Priority/Type: / Inspection
Department: Utilities and Infrastructure

MSGP Program
RG121.9
TA-3-38 Metals Fab Shop

Last PM: 9/27/2018
Project: Routine Facility Inspections Nov. 2018 (P-MSGP-RI-5346)

Contact:
Phone:

Reason: 2018 November Inspections

Special Instructions: NMR053195

*Inspection done
11/30/18
10:45 - 11:00 AM*

Tasks

#	Description	Meas.	No	N/A	Yes
Weather Information					
20	Describe the weather at time of inspection and document the temperature (F°).	40° cloudy	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Within the Facility Boundary					
40	Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
50	If "No" has a CAR been previously initiated for this new discharge?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
60	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Outfall Inspection (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comment)					
90	Monitored Outfall [002] Free of Evidence of Erosion? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
100	Monitored Outfall [002] Flow Dissipation Devices Operating Effectively? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
110	Monitored Outfall [002] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Control Measures (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comments).					
130	Asphalt Berm [0300103040009] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
140	Asphalt Berm [0300103040010] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
150	Base Course Berm [0300103020001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
160	Drop Inlet with Petro-Plug [0300109010003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
170	EnviroSoxx w/ MetalLoxx [0300103200007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
180	EnviroSoxx w/ MetalLoxx [0300103200008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Area/Activity exposed to stormwater (identify needed maintenance or a description of corrective actions in relevant task comment).					
200	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
210	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
220	Product/chemical storage areas (raw material): controls adequate (appropriate, effective,		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	and operating)? If "No" describe.			
230	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
240	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
250	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
260	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
270	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
280	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
290	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
300	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
310	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
320	Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
330	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
340	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
350	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
360	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Non-Compliance				
380	Free of incidents of observed non-compliance not already identified above? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Additional Control Measures				
400	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Labor

Labor	Assigned	Work Date	Reg Hrs	OT Hrs	Other Hrs
Burgin, Jillian	11/1/2018 / 1				

Labor Report

Completed: _____

Report: _____

WO ID: MS6P-R1-63346 Page 2 of 3

Name/Z#: Julian Burgin/211081

Signature (lead inspector): OP Burgin ^{DEP/} _{ASTC} Date and Time: 11/30/18
11:00 AM

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

CERTIFICATION STATEMENT

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

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

Print name and title: Russell Stone GL DESH - UTS

Signature: Russell Stone Date: 12/14/2018

Los Alamos National Lab - ADESH

Work Order MSGP-RI-63446

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

Maintenance Details

Requested: 12/17/2018 4:33:25 PM
Procedure: MSGP Routine Facility Inspection (EPC-CP-Form-1020.1)
Last PM: 11/30/2018
Project: Routine Facility Inspections Dec. 2018 (P-MSGP-RI-5353)
Reason: 2018 December Inspections

Target: 12/31/2018
Priority/Type: Normal / Inspection
Department: Utilities and Infrastructure

MSGP Program
RG121.9
TA-3-38 Metals Fab Shop

Contact:
Phone:

*Insp. done
12/18/18
2:15 - 2:35 pm*

Tasks

#	Description	Meas.	No	N/A	Yes
Weather Information					
20	Describe the weather at time of inspection and document the temperature (F°).	47° F	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Within the Facility Boundary					
40	Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
50	If "No" has a CAR been previously initiated for this new discharge?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
60	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Outfall Inspection (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comment)					
90	Monitored Outfall [002] Free of Evidence of Erosion? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
100	Monitored Outfall [002] Flow Dissipation Devices Operating Effectively? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
110	Monitored Outfall [002] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Control Measures (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comments)					
130	Asphalt Berm [0300103040009] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
140	Asphalt Berm [0300103040010] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
150	Base Course Berm [0300103020001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
160	Drop Inlet with Petro-Plug [0300109010003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.	Petro Plug OK for winter.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
170	EnviroSoxx w/ MetalLoxx [0300103200007] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
180	EnviroSoxx w/ MetalLoxx [0300103200008] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Area/Activity exposed to stormwater (identify needed maintenance or a description of corrective actions in relevant task comment)					
200	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	See CARs #1442 & 1443	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
210	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
220	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

230	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
240	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
250	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
260	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
270	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
280	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
290	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
300	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
310	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
320	Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
330	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
340	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
350	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
360	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Non-Compliance

380	Free of incidents of observed non-compliance not already identified above? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Additional Control Measures

400	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Labor

Labor	Assigned	Work Date	Reg Hrs	OT Hrs	Other Hrs
Burgin, Jillian	12/17/2018 / 1				
Wheeler, Holly	12/17/2018 / 1				

Labor Report

Completed: _____

Report: _____

WO ID: MSOP-RI-63444 Page 2 of 3

Name/Z#: Jillian Burgin/211081 for Holly Wheeler / 118432

Signature (lead inspector): J. Burgin, CESC/DEP Date and Time: 12/18/18 2:35 pm

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

CERTIFICATION STATEMENT

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

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

Print name and title: Russell Stone GL DESH - UTS

Signature: Russell Stone Date: 1/11/2019

ATTACHMENT 8: QUARTERLY VISUAL ASSESSMENTS

Since Triad, LLC took over the operating contract after the QVA period for 2018, QVAs for 2018 will be kept on file in the archived SWPPP for LANS, LLC.

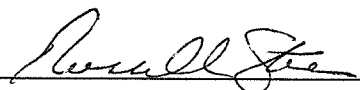
ATTACHMENT 9: CORRECTIVE ACTION DOCUMENTATION AND CERTIFICATION

CAR #	FOD	MSGP Facility Desc	Inspection Date	Specific Location	CA Report Status	Finding	Finding Other Desc	Problem Description	Inspection Type	Inspection Type Other	Corrective Action Description	SIO	SIO Affected	Provide Action Taken at Affected SIOs	Is SWPPP Modification Required?	CA Initiate Date	CA Complete Date	Completed	CA Expected Date	CA Status Desc	EPA Notified Date (if 45 day time frame is exceeded.)
1443	UI	TA-3-38 Metals Fab. Shop	12/18/2018 14:10	NW corner of the shop by the fence at the TA-3-38 Metal Fabrication Shop.	A new corrective action	Control measures inadequate to meet non-numeric effluent limitations	-	Along the north fence of the TA-3-38 Metals Fabrication Shop, large metal pipe was stored without being covered.	Routine facility inspection	-	Cover the pipe or move it inside.	N	-	-	N	12/19/2018 11:00	12/19/2018 12:00	Y	-	Cover the pipe or move it inside. Pipe was covered 12/19/18.	-
1442	UI	TA-3-38 Metals Fab. Shop	12/18/2018 14:10	Metal storage area at the TA-3-38 Metal Fabrication Shop.	A new corrective action	Control measures inadequate to meet non-numeric effluent limitations	-	Within the metal storage area at the TA-3-38 Metals Fabrication Shop, there was a rusted scale that is awaiting salvage/sale and a rusted sheet metal storage rack that need to be covered.	Routine facility inspection	-	Cover the base of the scale until it is salvaged/sold and either cover or paint the sheet metal storage rack.	N	-	-	N	12/20/2018 8:00	12/20/2018 9:00	Y	-	Cover the base of the scale until it is salvaged/sold and either cover or paint the sheet metal storage rack. Scale was sent to salvage 12/20/18.	-

CERTIFICATION FOR CORRECTIVE ACTIONS

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

Printed Name: Russell Stone Title: GL OESH-ULS

Signature:  Date: 1/22/2019

ATTACHMENT 10: TRAINING DOCUMENTATION

2018 SWPPP Training Roster – TA-03-38 Carpenter's Shop 12/13/2018

[illegible]

2018 Annual SWPPP Training

TA-3-38 Carpenter's Shop

- **Review 2017 training presentation (new employees to the SWPPP, if applicable)**
- **New BMPs:**
 - ✚ Covered storage bin for the metal posts at the SW section of the yard. It's cute!
- **Review of Corrective Actions for the year:**
 - ✚ 1/31/18: Tarp was totally torn off of the stack of metal posts at the southwest corner of the storage yard. CAR reported at time of inspection. The posts were recovered on 2/1/18.
 - ✚ 4/26/18: Metal posts are uncovered at SW corner of yard and a bundle of rebar is on the ground. Reported to facility personnel the same day of inspection. The shop is planning to make a covered storage container for the posts. The posts were re-tarped in the meantime - 5/15/18.
- **Water Quality Exceedances:**
 - ✚ 8/30/18: Discharge from outfall 073 at the TA-3-38 Carpenter Shop exceeded the New Mexico water quality standard for dissolved Copper. The concentration of dissolved Copper discharged during the storm event on 7/17/2018 was 17.1 ug/L and the water quality standard is 6 ug/L. Personnel shall evaluate potential pollutant sources of dissolved Copper and implement additional controls to ensure discharge of this pollutant source in stormwater is minimized. Facility personnel must immediately take action to minimize off site discharge of dissolved Copper at outfall 073. *Sweeping of the west lot at SM-38 Carpenter's Shop was performed on 7/30/18 which post-dates this exceedance.
 - ✚ 10/02/18: Discharge from outfall 073 at the TA-3-38 Carpenter Shop exceeded the New Mexico water quality standard for total recoverable Aluminum. The concentration of total recoverable Aluminum discharged during the storm event on 8/16/2018 was 1090 ug/L and the water quality standard is 681 ug/L. Personnel shall evaluate potential pollutant sources of total recoverable Aluminum and implement additional controls to ensure discharge of this pollutant source in stormwater is minimized. Evaluated site on 10/3/18 and requested Metallox Wattle be changed out and area swept around wood shavings bin. Work was completed by Roads & Grounds on 10/12/18.
- **Review of Spills:**
 - ✚ There were no spills or releases for the year. Yay! ☺
- **SWPPP updates for 2019:**
 - ✚ No major changes. Due ~2/1/19. LANS, LLC to Triad.
- **General Discussion/Issues:**



Storm Water Multi-Sector General Permit (MSGP) for Industrial Facilities

TA-3-38 Carpenter Shop (CS)

2017-2018 SWPPP Training

UNCLASSIFIED

TA-3-38 CS SWPPP- MSGP Permit

- The MSGP is a National Pollutant Discharge Elimination System (NPDES) Permit associated with the Clean Water Act (CWA) of 1973
 - Regulates storm water discharges from industrial facilities/activities
 - Objective is to minimize pollutants to surface waters
 - Requires implementation of a Stormwater Pollution Prevention Plan (SWPPP)
 - A new permit (with no.) is issued approx. every 5 years
 - 2015 MSGP #NMR053915 (LANS)
 - Link to 2015 MSGP: https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_finalpermit.pdf

UNCLASSIFIED

TA-3-38 CS SWPPP – LANL Facilities

■ LANL MSGP Regulated Facilities:

- **Metals Fab Shop** – TA-03-38: Sector AA (Fabricated Metal Products)
- **Carpenter Shop** – TA-03-38: Sector A (Timber Products)
- **Asphalt Batch Plant** – TA-60-233: Sector D (Asphalt Paving)
- **Metal Recycling Facility (MRF)** – TA-60-311: Sector N (Scrap Recycling)
- **Roads & Grounds** – TA-60-250: Sector P (Land Transportation/Warehousing)
- **Power Plant** – TA-03-1790: Sector O (Steam Electric Generating)
- **Heavy Equipment** – TA-60-01: Sector P (Land Transportation/Warehousing)
- **Salvage Yard** – TA-60-02: Sector P (Land Transportation/Warehousing)
- **TA-3-39 & 102** – Sector AA (Fabricated Metal Products)
- **Sigma Complex Foundry** – TA-03-66: Sector AA & F (Fabricated & Primary Metals)
- **TA-54** - TA-54-Area G, Area L & Rant: Sector K (Hazardous Waste TSDF)
- **Maint. Facility West** – TA-54-Area L: Sector P (Land Transportation/Warehousing)

UNCLASSIFIED

TA-3-38 CS SWPPP - Team Members

- TA-3-38 Carpenter Shop SWPPP Team:
 - Donnie Parrett, Shop Superintendent, LOG-Central Shops
 - Jillian Burgin, Deployed Environmental Professional (DEP)
 - Russell Stone, ESH Manager DSESH-UIS
 - Holly Wheeler, MSGP Compliance Lead, EPC-CP
 - See Facility Managers

- Facility Managers/FOD
 - Jim Farmer, Maintenance Manager, LOG-MSS
 - John Merhege, Logistics Division Leader
 - Andrew Erickson, UI FOD

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TA-3-38 CS SWPPP –Control Measures (BMPs)

- Run-On Control: The south and west boundary of the site is stabilized with rock and paving to provide run-on control from the west parking lot.



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TA-3-38 CS SWPPP – Control Measures (BMPs)

- Covered Metal/Material Storage: Covered storage racks, roll-off bins, enclosed storage sheds, and flam cabinets minimize storm water contact with materials and pollutants.



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TA-3-38 CS SWPPP - Control Measures (BMPs)

- Good House-Keeping Practices: Covered and enclosed trash bins minimize debris on site. Monthly sweeping of the west lot removes accumulated dust and reduces pollutants.
- YOU can help reduce trash as well: keep truck beds clean, properly dispose of food trash and cigarette butts, keep dumpsters closed. Recycle water bottles, cans, plastic bags, etc..



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TA-3-38 CS SWPPP - Spill Reporting

Know where spill kits are located.

Report spills immediately to your supervisor.

Additional contacts are provided in the LOG-MSS Guidance:





Do you know who to call in the event of a spill/leak?



Spills and leaks from vehicles, equipment and laboratory operations can accidentally occur. Oil, fuel, hydraulic fluids and other chemicals, once spilled or leaked to the environment are pollutants that require immediate clean-up and spill reporting. It is important to prevent pollutants from entering into a watercourse or storm drain and from coming into contact with storm water. If you have the ability and materials to contain a spill (i.e. spill kit—absorbent pads, booms, etc.) you may do so in order to prevent migration of the spilled material until additional help arrives. You are still required to report the spill and should be aware of who to contact.

The appropriate spill contact should be listed in your Integrated Work Document (IWD). This can vary from your PIC to the Security & Emergency Operations Center (SEO), also known as EM&R, to your site access control office. The name and contact information for your Waste Management Coordinator (WMC) should also be listed in the IWD.

When in doubt, contact the SEO. They will respond, assess the situation, determine further actions required and will contact appropriate personnel. The Environmental Protection & Compliance (EPC-CP) group will also be contacted. EPC-CP will ensure a Spill Report is completed to document the spill. If the pollutant has reached a watercourse or storm drain, EPC-CP is responsible for reporting the spill to the state environment department - NMED and EPA.

A WMC will ensure that waste from a spill clean-up is properly managed and disposed. The LOG-MSS or FOD Deployed Environmental Professional (DEP) can help coordinate spill response and clean-up activities and can complete the Spill Report form.

-Jillian Burgin, Deployed Environmental Professional for LOG-MSS



Report a Spill

SEO (EM&R):
667-6211

EPC-CP:
667-0666
or **Spill Pager**
664-7722

Roads & Grounds:
667-6111

WMCs Spill Pager:
664-5864

LOG-MSS DEP:
665-1893



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TA-3-38 CS SWPPP - Sampler & Outfalls

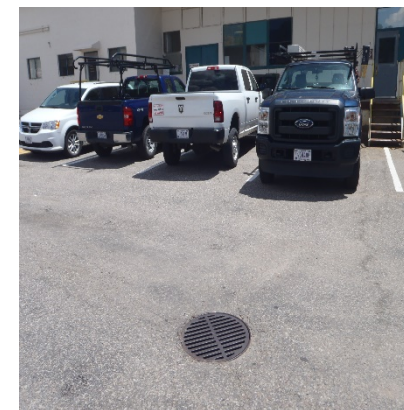
■ Sampler(s)

- Automated collection during storm events
- Monitoring for pollutants
 - Benchmark (sector specific limits)
 - Impaired Waters (receiving water)
 - Sandia Canyon



■ Storm Drains (Outfalls)

- Sample/discharge points (automated & visual)
- Evaluated during inspections
- Each numbered for site map
- 2 Outfalls on site, Outfalls 073 & 074
- 1 Monitored: Outfall 073 →



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TA-3-38 CS SWPPP – Sampling (Monitoring)

Sampling parameters for TA-3-38 CS

Monitoring Type	Location	Parameters	Numeric Limitations	Schedule
Benchmark Subsector A Timber Products Subsector A4 Wood Products not elsewhere classified (SIC 2449)	Sampler: MSGP07302 Outfall #073 Sandia Canyon	Chemical Oxygen Demand (COD)	120 mg/L	Quarterly
		Total Suspended Solids (TSS)	100 mg/L	
Impaired Waters	Sampler: MSGP07302 Outfall #073 Sandia Canyon	Aluminum	681 ug/L	Annual
		Gross Alpha, adjusted	15 pCi/L	
		Copper	6 ug/L	
		Thallium, dissolved	0.47 ug/L	
		PCB in Water Column	0.00064 ug/L	

UNCLASSIFIED

TA-3-38 CS SWPPP - Inspections

- **Monthly Routine Inspections**
 - Performed by DEP and facility rep, annual with EPC-CP
 - Check for non-compliance issues/identify corrective actions
 - (i.e. housekeeping, uncovered materials, spills/pollutant discharge, BMP integrity)
- **Quarterly Visual Inspections**
 - Performed during a storm event each quarter at each outfall (if possible)
 - Storm water sample collected in a clean, clear glass
 - Storm water sample evaluated for potential pollutants
 - (i.e. odor, oil sheen, suspended particles)
 - Additional BMPs may be required if pollutants are evident
- **Additional Reporting Requirements**
 - Annual reporting to EPA for corrective action status
 - Quarterly Discharge Monitoring Report (DMR) for sample results
 - Spill reporting to EPC-CP and potentially NMED if reportable

UNCLASSIFIED

TA-3-38 CS SWPPP - Corrective Actions

■ MSGP Corrective Action Process

- Once identified – immediate reporting to appropriate facility personnel
- Entered into CARs database/main-con. for EPC-CP reporting/tracking
- Specific deadlines for completion:
 - Same day or next day if identified late in the day or after regular business hours (quick fixes)
 - 14 days (order parts, schedule labor) >must provide schedule to EPC-CP
 - 45 days maximum (temporary BMPs required in the meantime)
 - >45 days: Report to EPC-CP for EPA is required (schedule must be provided for completion). EPA must approve schedule.
- FSRs with cost codes may be required
- Anyone can report – not just inspector or EPC-CP
- Exceedances from sampling can trigger corrective actions, applicable to the same deadlines as noted above.

UNCLASSIFIED

TA-3-38 CS SWPPP – Documentation

- **Required Documentation for SWPP Plan**
 - **Site Maps**
 - Facility Specific
 - Receiving Waters
 - Endangered Species
 - **Completed Inspection Forms & Templates**
 - **Annual Reporting Data**
 - **Notice of Intent (NOI) to EPA**
 - **Non-Storm Water Discharge Certification**
 - **Spill Tracking Table**
 - **Amendment Log**
 - **Sampling Results**
 - **Training Records**
 - **Critical Habitat Documentation/Historic Properties/NEPA**
 - **Procedures Referenced in the SWPPP**

UNCLASSIFIED

TA-3-38 CS SWPPP – Location & Contacts

- A hard copy of the SWPP Plan is kept in DEP office and/or at facility.
- The SWPP Plan is updated annually and can be found online on the public reading room at:
 - <http://permalink.lanl.gov/object/tr?what=info:lanl-repo/lareport/LA-UR-17-20933>

- **Environmental Contacts:**

- Jillian Burgin, DESHS-UIS, DEP: 665-1893
- Leonard Sandoval, DESHS-UIS, DEP: 231-1235
- Russell Stone, DESHS-UIS, ESH Mgr.: 606-0017
 - Holly Wheeler, EPC-CP: 667-1312

UNCLASSIFIED

2018 SWPPP Training Roster – TA-03-38 Metals Fabrication Shop 12/17/18

[illegible]

2018 Annual SWPPP Training

TA-3-38 Metals Fabrication Shop

- Review 2017 training presentation (new employees to the SWPPP, if applicable)
- **New BMPs:**
 - ✚ Berm at metal storage yard
- **Review of Corrective Actions for the year:**
 - ✚ 1/31/18: A pile of gravel (from a torn gravel bag) is directly east of the trench drain (at lower Pipefitter's shop). Clean up the gravel so it does not go into the trench drain. CAR reported to Pipefitter Foreman at the time of inspection. CA was completed 2/1/18.
 - ✚ 4/26/18: Metal piping is on the ground in front of the pipefitter's rack. Properly store piping on rack. Reported to pipefitter's and fire protection supervisors the same day of inspection.
 - ✚ 4/26/18: Trash is around dumpster and north fenceline around pipe rack. Clean up trash in areas listed above. Reported to Roads & Grounds the day of inspection. They are scheduled to clean up trash on 4/27.
 - ✚ 5/31/18: The MetalLoxx wattle [BMP #0300103200005] at the NE corner of the metal storage yard needs to be replaced. Roads & grounds will need to replace wattle. Wattle replaced morning of 6/11/18.
- **Water Quality Exceedances:**
 - ✚ 8/30/18: The average concentration of dissolved Zinc discharged from outfall 002 at the TA-3-38 Metals Fabrication Shop was mathematically certain to exceed the benchmark value. This average was calculated from monitoring results associated with storm events occurring on 10/04/2017, 10/05/2017 and 7/05/2018 and individual analytical results of 137 ug/L, 93.8 ug/L and 285 ug/L. The average was 128.95 ug/L. The benchmark value is 76 ug/L. Personnel shall evaluate potential pollutant sources of dissolved Zinc and implement additional controls to ensure discharge of this pollutant source in stormwater is minimized. Facility personnel must immediately take action to minimize off site discharge of dissolved Zinc at outfall 002. *Sweeping of the west lot at SM-38 Metals Fab was performed on 7/30/18 which post-dates this exceedance.
 - ✚ 8/30/18: Discharge from outfall 002 at the TA-3-38 Metals Fabrication Shop exceeded the New Mexico water quality standard for total recoverable Aluminum. The concentration of total recoverable Aluminum discharged during the storm event on 7/05/2018 was 1,550 ug/L and the water quality standard is 681 ug/L. Personnel shall evaluate potential pollutant sources of total recoverable Aluminum and implement additional controls to ensure discharge of this pollutant source in stormwater is minimized. Facility personnel must immediately take action to minimize off site discharge of total recoverable Aluminum at outfall 002. *Sweeping of the west lot at SM-38 Metals Fab was performed on 7/30/18 which post-dates this exceedance.
 - ✚ 8/30/18: Discharge from outfall 002 at the TA-3-38 Metals Fabrication Shop exceeded the New Mexico water quality standard for dissolved Copper. The concentration of

dissolved Copper discharged during the storm event on 7/05/2018 was 40 ug/L and the water quality standard is 6 ug/L. Personnel shall evaluate potential pollutant sources of dissolved Copper and implement additional controls to ensure discharge of this pollutant source in stormwater is minimized. Facility personnel must immediately take action to minimize off site discharge of dissolved Copper at outfall 002. *Sweeping of the west lot at SM-38 Metals Fab was performed on 7/30/18 which post-dates this exceedance.

- **Review of Spills:**

- ✚ There were no spills this year!

- **SWPPP updates for 2019:**

- **General Discussion/Issues:**

- ✚ Most CARs are not related to the MFS. This is why the berm was installed. We are hoping that sampling can be performed at the metal storage yard and the rest of the facility can be removed from the SWPPP.

- ✚ The Outfall 002 storm drain and Metallox wattle are on a PM for clean-out/replacement. April, July & October.

- ✚ Clean-up on the west side of SM-38 has been noticed.



Storm Water Multi-Sector General Permit (MSGP) for Industrial Facilities

TA-3-38 Metals Fabrication Shop

2017-2018 SWPPP Training

UNCLASSIFIED

TA-3-38 MFS SWPPP- MSGP Permit

- The MSGP is a National Pollutant Discharge Elimination System (NPDES) Permit associated with the Clean Water Act (CWA) of 1973
 - Regulates storm water discharges from industrial facilities/activities
 - Objective is to minimize pollutants to surface waters
 - A new permit (with no.) is issued approx. every 5 years - 2016 MSGP #NMR053915 (LANS)
 - Requires implementation of a Stormwater Pollution Prevention Plan (SWPPP)

UNCLASSIFIED

TA-3-38 MFS SWPPP – LANL Facilities

■ LANL MSGP Regulated Facilities:

- **Metals Fab Shop** – TA-03-38: Sector AA (Fabricated Metal Products)
- **Carpenter Shop** – TA-03-38: Sector A (Timber Products)
- **Asphalt Batch Plant** – TA-60-233: Sector D (Asphalt Paving)
- **Metal Recycling Facility (MRF)** – TA-60-311: Sector N (Scrap Recycling)
- **Roads & Grounds** – TA-60-250: Sector P (Land Transportation/Warehousing)
- **Power Plant** – TA-03-1790: Sector O (Steam Electric Generating)
- **Heavy Equipment** – TA-60-01: Sector P (Land Transportation/Warehousing)
- **Salvage Yard** – TA-60-02: Sector P (Land Transportation/Warehousing)
- **TA-3-39 & 102** – Sector AA (Fabricated Metal Products)
- **Sigma Complex Foundry** – TA-03-66: Sector AA & F (Fabricated & Primary Metals)
- **TA-54** - TA-54-Area G, Area L & Rant: Sector K (Hazardous Waste TSDF)
- **Maint. Facility West** – TA-54-Area L: Sector P (Land Transportation/Warehousing)

UNCLASSIFIED

TA-3-38 MFS SWPPP - Team Members

- TA-3-38 Metals Fabrication Shop SWPPP Team:
 - Thomas Chavez, Shop Superintendent, LOG-MSS
 - Jillian Burgin, Deployed Environmental Professional (DEP)
 - Russell Stone, ESH Manager DSESH-UIS
 - Holly Wheeler, MSGP Compliance Lead, EPC-CP

- Facility Managers/FOD
 - Jim Farmer, Maintenance Manager, LOG-MSS
 - John Merhege, Logistics Division Leader
 - Andrew Erickson, UI FOD

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TA-3-38 MFS SWPPP – Site Specific Control Measures (BMPs)

- Asphalt Berming: West & NW boundaries of the facility:
Reduces storm water run-on to the site from roadways and parking areas.



UNCLASSIFIED

TA-3-38 MFS SWPPP – Site Specific Control Measures (BMPs)

- Covered Metal/Material Storage: Covered storage racks and roll-off bins minimize storm water contact with materials and pollutants.



UNCLASSIFIED

TA-3-38 MFS SWPPP - Control Measures (BMPs)

- Good House-Keeping Practices: Covered and enclosed trash bins minimize debris on site. Monthly sweeping of the west lot removes accumulated dust and reduces pollutants. YOU can help reduce trash as well: keep truck beds clean, properly dispose of food trash and cigarette butts, keep dumpsters closed. Recycle water bottles, cans, plastic bags, etc..



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TA-3-38 MFS SWPPP - Control Measures (BMPs)

- Petro Pipe Oil Barrier: The Petro Pipe Oil Barrier is used at the end point of the drainage pipe for the trench drain sump (located west of the pipefitter's shop). This allows excess storm water discharge from the trench drain while filtering out oil sheen that accumulates from the parking lot run-off.



UNCLASSIFIED

TA-3-38 MFS SWPPP -Spill Reporting

Spill Kits for the TA-3-38 MFS are located in Rm 125 and in metal containers throughout the shop.

Report spills immediately to your supervisor. Additional contacts are provided in the LOG-MSS Guidance





Do you know who to call in the event of a spill/leak?



Spills and leaks from vehicles, equipment and laboratory operations can accidentally occur. Oil, fuel, hydraulic fluids and other chemicals, once spilled or leaked to the environment are pollutants that require immediate clean-up and spill reporting. It is important to prevent pollutants from entering into a watercourse or storm drain and from coming into contact with storm water. If you have the ability and materials to contain a spill (i.e. spill kit—absorbent pads, booms, etc.) you may do so in order to prevent migration of the spilled material until additional help arrives. You are still required to report the spill and should be aware of who to contact.

The appropriate spill contact should be listed in your Integrated Work Document (IWD). This can vary from your PIC to the Security & Emergency Operations Center (SEO), also known as EM&R, to your site access control office. The name and contact information for your Waste Management Coordinator (WMC) should also be listed in the IWD.

When in doubt, contact the SEO. They will respond, assess the situation, determine further actions required and will contact appropriate personnel. The Environmental Protection & Compliance (EPC-CP) group will also be contacted. EPC-CP will ensure a Spill Report is completed to document the spill. If the pollutant has reached a watercourse or storm drain, EPC-CP is responsible for reporting the spill to the state environment department - NMED and EPA.

A WMC will ensure that waste from a spill clean-up is properly managed and disposed. The LOG-MSS or FOD Deployed Environmental Professional (DEP) can help coordinate spill response and clean-up activities and can complete the Spill Report form.

-Jillian Burgin, Deployed Environmental Professional for LOG-MSS



Report a Spill

SEO (EM&R):
667-6211
EPC-CP:
667-0666
or Spill Pager
664-7722

Roads & Grounds:
667-6111

WMCs Spill Pager:
664-5864

LOG-MSS DEP:
665-1893

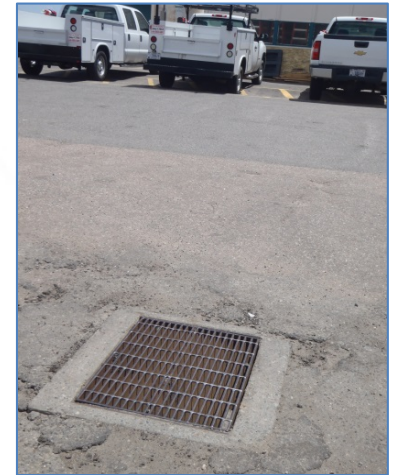


UNCLASSIFIED

TA-3-38 MFS SWPPP - Sampler & Outfalls

■ Sampler(s)

- Automated collection during storm events
- Monitoring for pollutants
 - Benchmark (sector specific limits)
 - Impaired Waters (receiving water)
 - **Sandia Canyon**



■ Storm Drains (Outfalls)

- Sample/discharge points (automated & visual)
- Evaluated during inspections
- Each numbered for site map
- **1 Monitored outfall on site: Outfall 002**



UNCLASSIFIED

TA-3-38 MFS SWPPP – Sampling (Monitoring)

Sampling parameters for TA-3-38 MFS

Monitoring Type	Location	Parameters		Numeric Limitations	Schedule
Benchmark Subsector AA1. Fabricated Metal Products, except Coating (SIC 3411-3499; 3911-3915)	Sampler: MSGP02001 Outfall #002 Sandia Canyon	Total Aluminum*	0.681 mg/L	None *Hardness Dependent 57 (60) mg/L	Quarterly
		Total Iron	1.0 mg/L		
		Total Zinc1*	0.076 mg/L		
		Nitrate plus Nitrite Nitrogen	0.68 mg/L		
Impaired Waters	Sampler: MSGP02001 Outfall #002 Sandia Canyon	Aluminum	0.681 mg/L	None	Annual
		Gross Alpha, adjusted	15 pCi/L		
		Copper	0.006 mg/L		
		Thallium, dissolved	0.47 ug/L		
		PCB in Water Column	0.00064 ug/L		

UNCLASSIFIED

TA-3-38 MFS SWPPP - Inspections

- **Monthly Routine Inspections**
 - Performed by DEP, annual with EPC-CP
 - Check for non-compliance issues/identify corrective actions
 - (i.e. housekeeping, uncovered materials, spills/pollutant discharge, BMP integrity)
- **Quarterly Visual Inspections**
 - Performed during a storm event each quarter at each outfall (if possible)
 - Storm water sample collected in a clean, clear glass
 - Storm water sample evaluated for potential pollutants
 - (i.e. odor, oil sheen, suspended particles)
 - Additional BMPs may be required if pollutants are evident
- **Additional Reporting Requirements**
 - Annual reporting to EPA for corrective action status
 - Quarterly Discharge Monitoring Report (DMR) for sample results
 - Spill reporting to EPC-CP and potentially NMED if reportable

UNCLASSIFIED

TA-3-38 MFS SWPPP - Corrective Actions

■ MSGP Corrective Action Process

- Once identified – immediate reporting to appropriate facility personnel
- Entered into CARs database/main-con. for EPC-CP reporting/tracking
- Specific deadlines for completion:
 - Same day or next day if identified late in the day or after regular business hours (quick fixes)
 - 14 days (order parts, schedule labor) >must provide schedule to EPC-CP
 - 45 days maximum (temporary BMPs required in the meantime)
 - >45 days: Report to EPC-CP for EPA is required (schedule must be provided for completion). EPA must approve schedule.
- FSRs with cost codes may be required
- Anyone can report – not just inspector or EPC-CP
- Exceedances from sampling can trigger corrective actions, applicable to the same deadlines as noted above.

UNCLASSIFIED

TA-3-38 MFS SWPPP – Documentation

- **Required Documentation for SWPP Plan**
 - **Site Maps**
 - Facility Specific
 - Receiving Waters
 - Endangered Species
 - **Completed Inspection Forms & Templates**
 - **Annual Reporting Data**
 - **Notice of Intent (NOI) to EPA**
 - **Non-Storm Water Discharge Certification**
 - **Spill Tracking Table**
 - **Amendment Log**
 - **Sampling Results**
 - **Training Records**
 - **Critical Habitat Documentation/Historic Properties/NEPA**
 - **Procedures Referenced in the SWPPP**

UNCLASSIFIED

TA-3-38 MFS SWPPP

- The SWPP Plan is updated annually and can be found online on the public reading room at:
 - <http://permalink.lanl.gov/object/tr?what=info:lanl-repo/lareport/LA-UR-16-20816>
- **Environmental Contacts:**
 - Jillian Burgin, DESHS-UIS, DEP: 665-1893
 - Russell Stone, DESHS-UIS, ESH Mgr.: 606-0017
 - Holly Wheeler, EPC-CP: 667-1312

UNCLASSIFIED

ATTACHMENT 11: MSGP (OR ACTIVE URL)

A copy of the 2015 MSGP is kept on file with the SWPPP hard copy.

The active URL for the permit is: <https://www.epa.gov/npdes/final-2015-msgp-documents>

**ATTACHMENT 12: THREATENED AND ENDANGERED SPECIES HABITAT MANAGEMENT PLAN FOR
LOS ALAMOS NATIONAL LABORATORY**

LA-UR-14-21863

*Approved for public release;
distribution is unlimited.*

Title: **Threatened and Endangered Species
Habitat Management Plan for
Los Alamos National Laboratory**

Author(s): Environmental Protection Division
Resources Management Team

Intended for: Reference purposes

Date: March 2014



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ACRONYMS

AEI	Area of Environmental Interest
BA	biological assessment
Bd	Batrachochytrium dendrobatidis
BSL-3	Biosafety Level 3
COPCs	chemicals of potential concern
DARHT	Dual-Axis Radiographic Hydrodynamic Test (Facility)
dB	Decibel
DDT	(dichloro-diphenyl-trichloroethane)
DOE	U.S. Department of Energy
EPA	Environmental Protection Agency
ESA	Endangered Species Act of 1973
fc	foot candles
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
NEPA	National Environmental Policy Act
NMED	New Mexico Environment Department
NPDES	National Pollutant Discharge Eliminations System
PCBs	polychlorinated biphenyls
PR-ID	Permits and Requirements Identification
SME	subject matter expert
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) was prepared to fulfill a commitment made in the U.S. Department of Energy's (DOE) "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). In this 2014 update, we retained the management guidelines from the 1999 HMP for listed species, updated some descriptive information, and added the Jemez Mountains salamander (*Plethodon neomexicanus*), which was federally listed in September 2013 (USFWS consultation number 02ENNM00-2014-I-0014).

2.0 ROLE OF SITE PLANS IN THE HMP

The purpose of the HMP is to provide a management strategy for 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 traillii extimus*), and the Jemez Mountains salamander. Site plans provide guidance to ensure that LANL operations do not adversely affect threatened or endangered species or their habitats.

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. Allowable activities are activities that the USFWS has reviewed 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

Summary: Habitat alteration is not restricted in developed areas unless it impacts undeveloped core areas of an AEI (e.g., noise and light impacts on a core area). Current ongoing disturbance activities are not restricted in developed areas. Disturbance activities not currently ongoing are

restricted when impacts occur to undeveloped core areas of an AEI that are occupied by a threatened or endangered species.

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 are contained in the HMP GIS database.

Developed areas are located in the core and/or buffer of some 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. If a proposed action within a developed area does not meet site plan guidelines, it must be individually reviewed for compliance with the Endangered Species Act of 1973 (ESA).

Building a new structure or clearing land within a previously designated developed area in an AEI core does not add to the size of the developed area. New structures in core areas will not be given any developed-area border unless they are individually reviewed for ESA compliance.

Development occurring in the developed area in an AEI buffer can be given a 15 m (49 ft) developed-area border at the discretion of the project leader or facility manager. To expand the size of a developed area in a buffer based on new developments, please contact a LANL biological resources subject matter expert (SME) (<http://int.lanl.gov/environment/bio/controls/index.shtml>).

3.2 General Description of Buffer Areas and Allowable Buffer Area Development

Summary: Limited future development is allowed in the currently undeveloped DOE-controlled buffer area under the guidelines of this HMP as long as it does not alter habitat in the undeveloped AEI core (including light and noise guidelines). Development beyond the cap established for each AEI, or greater than 2 ha (5 ac) in size including the developed-area border, requires independent review for ESA compliance.

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 area 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 LANL biological resources SMEs for tracking (<http://int.lanl.gov/environment/bio/controls/index.shtml>). Descriptions of each of the AEIs give the total area in each buffer area available for development.

3.3 Emergency Actions

Summary: Contact DOE and LANL biological resources SMEs as soon as possible.

If safety and/or property is immediately threatened by something occurring within an AEI (for example, wildfire, water line breakage, etc.) managers may activate emergency actions. Contact a LANL biological resources SME (<http://int.lanl.gov/environment/bio/controls/index.shtml>), the Environmental Stewardship Group (1-505-665-8855), or the DOE Los Alamos Field Office (Field Office; 1-505-667-6819) as soon as possible. If the emergency occurs outside of regular business hours, contact the Emergency Management Office (1-505-667-6211). 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

Summary: 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.

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 Permits and Requirements Identification (PR-ID) for a new or modified project is required under Program Description 400 (LANL 2013) and allows managers to identify the requirements within their project area. Deployed environmental professionals and core LANL biological resources SMEs 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 SMEs. Contacts can be found at <http://int.lanl.gov/environment/compliance/ier/index.shtml>.

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.

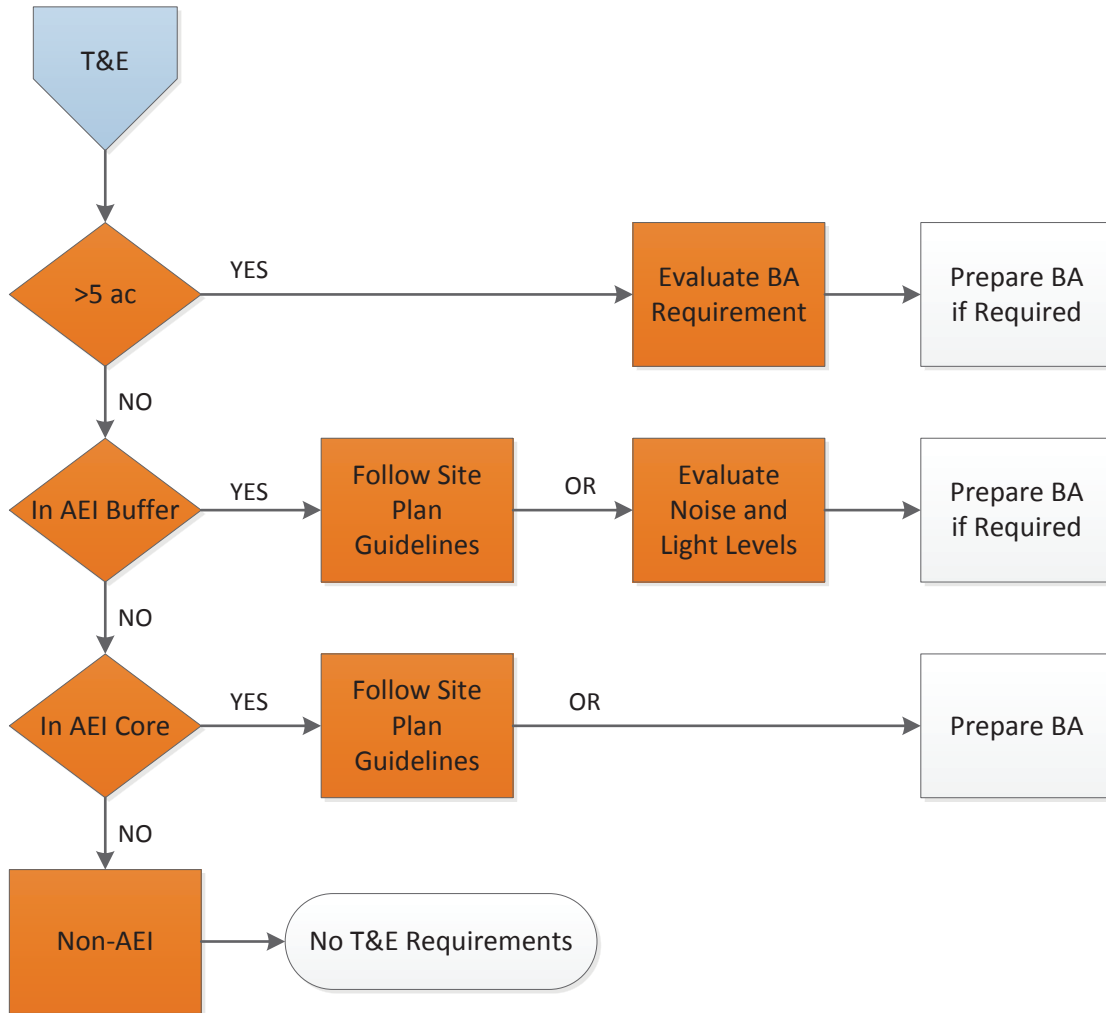


Figure 1. Process flowchart for determining site plan requirements.

4.2 If an Activity Does Not Meet Site Plan Guidelines

Summary: Activities or projects that do not meet all applicable site plan guidelines must be evaluated individually for compliance with the ESA.

If a project reviewer determines that an activity or project cannot meet the guidelines in applicable site plans, LANL biological resources SMEs evaluate that activity individually for compliance with the ESA. Results of the evaluation of potential impacts allow LANL biological resources SMEs 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 possibility of adverse effects 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 (BA) for the activity and submit it to the USFWS for concurrence. Fieldwork and preparation of a BA 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

Although information about threatened and endangered species is not classified, it is considered sensitive information. It is in the best interest of threatened and endangered species to restrict specific knowledge about their locations. Habitat locations of threatened and endangered species are not considered sensitive.

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.

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, which are prime habitat for black-footed ferrets, have been observed on DOE property around LANL. Therefore, there is no site plan for this species.

In 2005, the USFWS concurred with DOE's proposal for new 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).

6.0 DATA MANAGEMENT

The data used in the implementation of the HMP is stored in a GIS database at LANL.

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 characteristic 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 seem to 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 mice (*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 and fires, 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 DOE property around 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, are 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 itself 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).

LANL 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 (COPCs) 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 COPCs (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, LANL biological resources SMEs 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. LANL biological resources SMEs have 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 for Mexican Spotted Owls that 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 no specific information on the reaction of Mexican Spotted Owls to explosives detonation currently available. 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 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 dB(A)¹ 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). LANL biological resources SMEs 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). LANL biological resources SMEs 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 which limit human activity and development in the canyon bottoms.

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. Also, there is noise 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 2005 Compliance Order on Consent (NMED 2005) issued by the New Mexico Environmental Department (NMED) 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 (NPDES) Individual Permit (EPA 2010) issued by the Environmental Protection Agency (EPA) 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. LANL biological resources SMEs 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).

¹ 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.

Noise measurements were conducted by LANL biological resources SMEs at the Los Alamos County airport and in Bayo and Pueblo canyons, including the Los Alamos County Sewage Treatment Facility, in December 1997. 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 three-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 three-minute period was 60 (range 41 to 70).

LANL biological resources SMEs 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 scale (Keller and Foxx 1997). Measurements of noise levels using the C-weighted decibel scale are greater than if measured using A-weighted decibels. 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.

LANL biological resources SMEs measured sound levels from various pieces of construction equipment used at project sites at LANL 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 dB(A) 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 levels before construction began was 56.6 dB(A), and the average during construction was 82.1 dB(A).

LANL biological resources SMEs 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 10 percent developed area in their buffers had significantly higher levels of background noise than undeveloped AEIs. Mean background sound levels were 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.

LANL biological resources SMEs 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 BA 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.

LANL biological resources SMEs took sound level measurements around the LANL Biosafety Level 3 (BSL-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 BSL-3 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 with 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. LANL biological resources SMEs 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.

A new Mexican Spotted Owl habitat model was developed and refined for application on LANL 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, 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. AEI boundaries are maintained in the LANL biological resources program GIS database.

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

Summary: The occupancy status of an AEI affects what disturbance activities are allowable in different areas (core, buffer, developed) of the AEI. All Mexican Spotted Owl AEIs are considered occupied during March 1 through August 31 or until surveys show the AEI to be unoccupied. See the Activity Table (Table 1, Section 4.5.2) for restrictions on occupied undeveloped core and buffer areas, and Part I, Section 3.1 for restrictions on developed areas.

Occupancy simply refers to whether or not an AEI is occupied during a species' period of sensitivity. For Mexican Spotted Owls, LANL is primarily concerned with protecting 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 LANL biological resources SME to find out the current occupancy status of an AEI (<http://int.lanl.gov/environment/bio/controls/index.shtml>).

4.3 Introduction to AEI Management Guidelines

Summary: The habitat alterations section and the activities section give the guidelines for habitat alteration and disturbance activities, respectively, for Mexican Spotted Owl AEIs. The flow chart (see Figure 1) provides a quick reference to determine what, if any, guidelines need to be consulted for a specific activity. Protective measures give management practices that should be applied when working or considering work in AEIs. LANL biological resources SMEs are available to answer questions and provide advice (<http://int.lanl.gov/environment/bio/controls/index.shtml>).

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. LANL biological resources SMEs 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 ≥ 6 dB(A) during any portion of the 24-hour day, or it increases average light levels by ≥ 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, LANL biological resources SMEs 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 have to be reported to LANL biological resources SMEs for tracking.

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 Racine 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

Summary: Habitat alterations other than fuels management practices and utility corridor maintenance are not allowed in undeveloped core areas. Habitat alterations in buffer areas are restricted to 2 ha (5 ac) per project, with a maximum cap on development in the buffer for each AEI. Habitat alterations other than fuels management and utility corridor maintenance must be reported to LANL biological resources SMEs for tracking (<http://int.lanl.gov/environment/bio/controls/index.shtml>).

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 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 LANL's biological resources SMEs for tracking (<http://int.lanl.gov/environment/bio/controls/index.shtml>). 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

LANL biological resources SMEs 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). LANL biological resources SMEs 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. LANL biological resources SMEs have 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 BA (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. LANL biological resources SMEs 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 LANL 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 LANL biological resources SMEs 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

	Core	Buffer
<i>People</i>		
Low	No Restrictions*	No Restrictions
Medium	March 1 to August 31	No Restrictions
High	March 1 to August 31	No Restrictions
<i>Vehicles</i>		
Low	No Restrictions	No Restrictions
Medium	March 1 to August 31	No Restrictions
High	March 1 to August 31	No Restrictions
<i>Aircraft</i>		
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
<i>Other Light Production</i>		
Low	March 1 to August 31	No Restrictions**
Medium	March 1 to August 31	No Restrictions**
High	March 1 to August 31	No Restrictions**
<i>Other Noise Production</i>		
Low	March 1 to August 31	No Restrictions**
Medium	March 1 to August 31	No Restrictions**
High	March 1 to August 31	No Restrictions**
<i>Explosives Detonation (see text in Section 4.5.1)</i>		

*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.

**Noise or light production in the buffer is restricted if the activity would violate core area restrictions on noise or light.

4.6 Protective Measures

Summary: 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.
- Every reasonable effort should be made 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.

- Put signs on dirt roads and trails leading into AEIs labeling them as restricted access areas and providing a number to contact 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.
- Appropriate erosion and runoff controls should be employed to reduce soil loss. The controls must be put in place and periodically checked throughout the life of projects.
- All exposed soils must be revegetated as soon as feasible after construction to minimize erosion.
- In the Los Alamos Canyon AEI, development should be focused away from undeveloped areas on the western end of the 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 redelination of the habitats, and many have experienced additional development. Development in buffer habitat was not addressed during the 2005 consultation. Many projects were reviewed and received USFWS concurrence between 1999 and 2014.

LANL biological resources SMEs have provided the current development status for each of the AEIs at the end of each paragraph. The percent developed numbers were derived with the original size of the AEIs.

Cañon de Valle—In 1999, 16.3 ha (40.3 ac, 2.9 percent) of the core was developed and 52.2 ha (129 ac, 6.8 percent) of the DOE-controlled 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 had been developed.

Pajarito—In 1999, there were 6.7 ha (16.5 ac, 5.5 percent) of the core developed and 75.1 ha (186.5 ac, 16.7percent) developed in the buffer. LANL biological resources SMEs recommended only an additional 35 ha (86.4 ac) of the buffer be developed before additional USFWS consultations take place. The 1999 HMP stated that once the cap is reached or a single large-scale project is proposed, additional consultation would be required. By 2011, 27 ha (66.7 ac) of the core and 89 ha (220 ac) of the buffer had been developed.

Los Alamos—In 1999, there were 77.16 ha (190 ac) of the core developed and 167.2 ha (413.1 ac) developed in the buffer. For this AEI, LANL biological resources SMEs recommended only an

additional 28.6 ha (70.6 ac, 5.9 percent) of the DOE-owned buffer be developed before additional USFWS consultations take place.

Because this AEI is so heavily developed, additional development was restricted to a few selected areas within the buffer. Development outside of these areas requires individual review for ESA compliance. A large percentage of this AEI was removed in the 2005 and 2013 BAs. By 2011, 94 ha (232.2 ac) of the core and 181 ha (447.3 ac) of the buffer had been developed.

Sandia-Mortandad—In 1999, 98.4 ha (243.2 ac) of this AEI on DOE lands were developed, including 29 ha (71.7 ac, 10.7 percent) of the core and 75.1 ha (185.6 ac, 16.7 percent) of the buffer. For this AEI, LANL biological resources SMEs recommended only an additional 38.1 ha (94.1 ac) of the buffer be developed before additional USFWS consultations take place. Once this cap is reached or a single large-scale project is proposed, additional consultation will be required. By 2011, 45 ha (111.2 ac) of the core and 83 ha (205.1 ac) of the buffer had been developed.

Three Mile—In 1999, 25.3 ha (62.5 ac) of this AEI on DOE lands were developed, including 3.8 ha (9.4 ac, 2.8 percent) of the core and 21.5 ha (51.1 ac, 7.3 percent) of the buffer. For this AEI, LANL biological resources SMEs recommended only 64.3 ha (158.8 ac) additional area of buffer be developed before additional USFWS consultations take place. Once this cap is reached or a single large-scale project is proposed, additional consultation will be required. By 2011, 12 ha (29.6 ac) of the core and 37 ha (91.4 ac) of the buffer had been 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 2005 (70 FR 60885). The most recent recovery plan was published for Southwestern Willow Flycatcher 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 June 15 through July 20) that one can assume 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 is estimated at 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 loss and

modification of its habitat 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 itself 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 of Cochiti Lake. There are other riparian/wetland areas on LANL associated with canyon bottoms, the most significant one being Pajarito wetlands in the lower end of Pajarito Canyon. A major paved road traverses the wetlands area in Pajarito Canyon.

2.2.2 Ecological Risk

There is no specific information on the impact of chemicals on Southwestern Willow Flycatcher.

2.2.2.1 Ecorisk Assessment

LANL completed two ecological risk assessments that included the Southwestern Willow Flycatcher between 1997 and 2009. The ecological risk assessment process involves using computer modeling to assess potential effects to animals from COPCs 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 COPCs (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 on the reactions of Southwestern Willow Flycatchers to pedestrians and vehicles available. 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 on the reaction of Southwestern Willow Flycatchers to aircraft available.

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 on the reaction of Southwestern Willow Flycatchers to explosives detonation available. The Southwestern Willow Flycatcher AEI is not located close to any explosives testing sites at LANL.

2.2.3.4 Other Sources of Noise

LANL biological resources SMEs 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 on the effects of artificially produced light on Southwestern Willow Flycatchers available. 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 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 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

LANL has one AEI for Southwestern Willow Flycatcher. 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. The boundaries of the Southwestern

Willow Flycatcher AEI are maintained in the biological resources program GIS database at LANL.

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) with 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

Summary: The occupancy status of an AEI affects what disturbance activities are allowable in different areas (core, buffer, developed) of the AEI. The Southwestern Willow Flycatcher AEI is considered occupied during May 15 through September 15 or until the surveys show the AEI to be unoccupied. See the Activity Table (Table 2, Section 4.5.2) for restrictions on occupied undeveloped core and buffer areas, and Part I, Section 2.3 for restrictions on developed areas.

Occupancy simply refers to whether or not an AEI is occupied during a species' period of sensitivity. For Southwestern Willow Flycatchers, LANL biological resources SMEs 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. Table 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 LANL biological resources SME to find out the current occupancy status of an AEI (<http://int.lanl.gov/environment/bio/controls/index.shtml>).

4.3 Introduction to AEI Management Guidelines

Summary: The habitat alterations section (Section 4.4) and the activities section (Section 4.5) gives the guidelines for habitat alteration and disturbance activities, respectively, for the

Southwestern Willow Flycatcher AEI. The flow chart (see Figure 1) provides a quick reference to determine what, if any, guidelines need to be consulted for a specific activity. Protective measures give management practices that should be applied when working or considering work in AEIs. LANL biological resources SMEs are available to answer questions and provide advice (<http://int.lanl.gov/environment/bio/controls/index.shtml>).

Sections 4.4 and 4.5 provide the guidelines for habitat alterations and allowable activities in AEI core and buffer areas. The flow chart (see Figure 1) provides a quick reference that should be used to determine whether 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. LANL biological resources SMEs 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 alters over the long-term 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. All fuels management activities in developed and buffer areas must follow the guidelines in the Activity Table (Table 2, Section 4.5.2) if the AEI is occupied.

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 Racine 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 for occupied AEIs.

4.4.4 Restrictions on Habitat Alterations

Summary: 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 LANL biological resources SME 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

LANL biological resources SMEs 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 U.S. 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

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 LANL biological resources SME (<http://int.lanl.gov/environment/bio/controls/index.shtml>).

Table 2. Restrictions on Activities in Undeveloped Occupied Southwestern Willow Flycatcher AEI

		Core	Buffer
<i>Restrictions on Occupied Habitat</i>			
<i>People</i>			
	Low	No Restrictions	No Restrictions
	Medium	May 15 to August 15	No Restrictions
	High	May 15 to September 15	No Restrictions
<i>Vehicles</i>			
	Low	May 15 to September 15	No Restrictions
	Medium	May 15 to September 15	No Restrictions
	High	May 15 to September 15	No Restrictions
<i>Aircraft</i>			
	Low	No Restrictions	No Restrictions
	Medium	May 15 to August 15	May 15 to August 15
	High	May 15 to September 15	May 15 to August 15
<i>Other Light/Noise Production</i>			
	Low	May 15 to September 15	No Restrictions*
	Medium	May 15 to September 15	No Restrictions*
	High	May 15 to September 15	No Restrictions*

*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

Summary: This section provides a list of management practices to apply in the AEI.

- No wetland vegetation will be removed outside of developed areas.
- Appropriate erosion and runoff controls should be employed 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.
- All exposed soils must be revegetated 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. LANL biological resources SMEs 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), LANL biological resources SMEs 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 (*Plethodon neomexicanus*) 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 (FR 2012) and the final listing as endangered was on 10 September 2013 (FR 2013a)

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 Rierner 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; FR 2013b).

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 (FR 2012). 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 (FR 2013b).

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 (FR 2012).

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 which 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 (FR 2012). Forested habitats on LANL 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 (FR 2012). 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 (FR 2012).

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 Salamander 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 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 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: 7,000 ft (2,150 m) 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 × 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, LANL biological resources SMEs 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 since this landcover map was published from fire and extreme drought effects. 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 LANL biological resources SMEs walking down all of the modeled habitat polygons to look for the presence of indicator 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 that LANL would recognize were hand digitized using ArcGIS (Environmental Science Research Institute, Redlands, California) by LANL biological resources SMEs 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 facility.

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 LANL biological resources SMEs.

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 LANL biological resources SMEs 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 LANL biological resources SMEs 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 LANL biological resources SME (1-505-665-3366) as soon as possible. If the emergency occurs outside of regular business hours, contact the Emergency Management Office (1-505-667-6211). This office will then communicate with the appropriate LANL 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. LANL biological resources SMEs are always 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 LANL biological resources SMEs.

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 (FR 2012), 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 LANL biological resources SMEs. 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). LANL biological resources SMEs 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 LANL biological resources SMEs 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	Relative Abundance
<i>Neotoma</i> spp.	26.22
<i>Peromyscus</i> spp.	10.22
<i>Microtus</i> 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

ATTACHMENT 13: 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

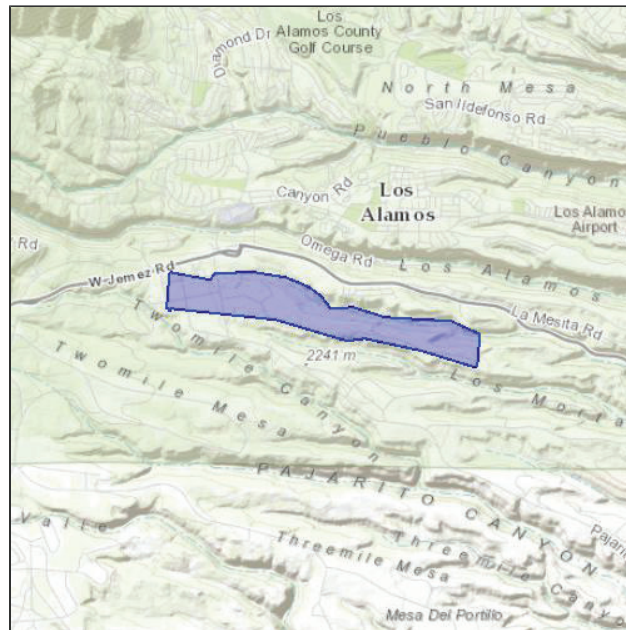
LXATM-TI5EJ-BAJEQ-3NC5E-SOGYTE

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 <i>Haliaeetus leucocephalus</i> Season: Wintering https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?scode=B008	Bird of conservation concern
Bendire's Thrasher <i>Toxostoma bendirei</i> Season: Breeding	Bird of conservation concern
Brewer's Sparrow <i>Spizella breweri</i> Season: Migrating https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?scode=B0HA	Bird of conservation concern
Brown-capped Rosy-finch <i>Leucosticte australis</i> Season: Wintering	Bird of conservation concern
Burrowing Owl <i>Athene cunicularia</i> Season: Breeding	Bird of conservation concern
Cassin's Finch <i>Carpodacus cassinii</i> Year-round	Bird of conservation concern
Flammulated Owl <i>Otus flammeolus</i> Season: Breeding https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?scode=B0DK	Bird of conservation concern
Fox Sparrow <i>Passerella iliaca</i> Season: Wintering	Bird of conservation concern
Golden Eagle <i>Aquila chrysaetos</i> Year-round https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?scode=B0DV	Bird of conservation concern
Grace's Warbler <i>Dendroica graciae</i> Season: Breeding	Bird of conservation concern
Juniper Titmouse <i>Baeolophus ridgwayi</i> Year-round	Bird of conservation concern
Lewis's Woodpecker <i>Melanerpes lewis</i> Year-round	Bird of conservation concern
Loggerhead Shrike <i>Lanius ludovicianus</i> Year-round https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?scode=B0FY	Bird of conservation concern

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 [National Wildlife Refuge](#) lands must undergo a 'Compatibility Determination' conducted by the Refuge. If your project overlaps or otherwise impacts a Refuge, please contact that Refuge to discuss the authorization process.

There are no refuges within this project area

Wetlands

Impacts to [NWI wetlands](#) 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.S. Army Corps of Engineers District](#).

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 tubercid 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 14: EPC-CP-QAPP-MSGP

The EPC-CP-QAPP-MSGP is in the process of being updated and finalized. The current document, ENV-CP-QAPP-MSGP R-5, is included in the attachment and will be replaced in the hard copy of the SWPPP once the new document is completed.

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:
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Derivative Classifier: ☐ Unclassified ☒ DUSA ENVPRO

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Responsible Line Manager:	Organization:	Signature:	Date:
Anthony Grieggs	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.

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History of Revisions

Document Number <i>[Include revision number, beginning with Revision 0]</i>	Effective Date <i>[Document Control Coordinator inserts effective date]</i>	Description of Changes <i>[List specific changes made since the previous revision]</i>
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.

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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:

- DOE Order 414.1C, *Quality Assurance*
- [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 cross-functional and focus on specific Laboratory water quality responsibilities, deliverables, or

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:
 - Conditions and activities that could impact stormwater quality at the facility.
 - Inadequate or ineffective BMPs.
 - Required modification or maintenance of existing BMPs.
 - Locations requiring new or additional BMPs.
 - Potential pollutant sources associated with the facility.
 - 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:
 - Prepare reports in a clear, concise manner, identifying site conditions and issues.
 - Write legibly and describe conditions clearly and accurately.
 - Use proper spelling and grammar.
 - Complete the MSGP Routine Inspection Report forms accurately.
 - 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.
 - Identify and specify appropriate BMPs and stabilization measures.
 - Identify potential pollutant sources associated with the facility.
 - Perform necessary calculations to meet regulatory requirements.
 - Prepare a site map.
 - 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:
 - Collect quarterly visual samples at the designated outfall.
 - 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,

	experience, and training.
--	---------------------------

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	<p>Identify opportunities for process improvement, health and safety enhancement, environmental protection, or other improvements of the program's operations.</p> <p>Discuss the identified opportunities with the Project Lead.</p> <p>Ensure issues are reported and corrected in a timely manner.</p>

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: <http://int.lanl.gov/orgs/env/rcra/qa.shtml>, 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 <i>SD330, Los Alamos National Laboratory Quality Assurance Program</i>
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.

Security -- 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.

Verification of data -- 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

Validation --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

Verification of calculations -- 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:

Backups -- 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.

Verification of data -- 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.

Verification of calculations -- 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.

Software control -- 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.

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 Activity	Parameter	Effluent Limit	Monitoring Frequency	Sample Type
Discharges from asphalt emulsion facilities	Total Suspended Solids	23.0 mg/L daily max. 15.0 mg/L, 30-day avg.	1/year	grab
	pH	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](#).

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	<p>Ensure that all project monitoring requirements are performed in accordance with the MSGP.</p> <p>Review and update the MSGP Sampling and Analysis Plan annually.</p>

	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 style="list-style-type: none"> • Implement monitoring program as required by the MSGP Project Lead. • Conduct stormwater sampling in accordance with the MSGP Sampling and Analysis Plan and applicable procedures. • Ensure procedures for sample handling and control during sample preparation and retrieval are followed.
Sample Management Office	<ul style="list-style-type: none"> • Develop Statements of Work (SOW) for all analytical laboratories that perform analytical work for the MSGP project in accordance with P840-1, Procurement Quality. • Ensure analytical laboratories comply with the DOE's SOW. Conduct an annual audit of the laboratory to ensure compliance with the SOW. • Approve Statements of Work for analytical laboratories that are contracted to analyze water samples. • Approve analytical laboratories that are contracted to analyze water samples for regulatory compliance purposes. • Accept samples and submit them to an approved analytical laboratory for analysis. • Track progress of samples at the analytical laboratory and resolve issues with sample analysis. • Receive data packages from the analytical laboratory and enter data into the database. • Provide the MSGP Project Lead with monthly invoice updates. • Perform V&V of field data submitted and uploaded from forms when samples are submitted to the SMO.
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 style="list-style-type: none"> • Ensure implementing procedures for sample analyses are used. • Ensure that MDMRs are submitted to EPA and NMED in accordance with the MSGP.
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

- 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.

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 style="list-style-type: none"> Coordinate with Project Lead and provide funding as needed to install, inspect, maintain and implement identified BMPs. Certify the corrective actions identified by the Project Lead and/or facility personnel (or their representatives) for their individual facilities in the Annual Report.

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 Action

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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 style="list-style-type: none"> Assure that analytical data is reviewed and accurate. Notify appropriate SWPPP owners, Laboratory management, and Deployed Environmental Professionals. Develop a corrective action plan. Follow up with corrective actions if required. Track corrective actions.
Facility Management and DEP	<ul style="list-style-type: none"> 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

	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	<ul style="list-style-type: none"> • 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.

Formal design reviews, including design verifications and evaluation of design changes, will be conducted to ensure that the design input is correctly incorporated into the design output. Changes to design will undergo the same review as the original design.

Verification and validation of the adequacy of designs are conducted before relying on the performance of the design function. Verification and validation are conducted in accordance with implementing procedures.

The following table lists responsibilities.

Who	What
Project Lead	<ul style="list-style-type: none"> • Provide input to the design process in accordance with appropriate standards, requirements, and implementing procedures. • Determine the qualifications required to perform a review of design documents. • Identify a resource with skills, knowledge, ability, training, and certifications required to complete the review of the facility engineering design documents. • Communicate the results of the review to the requestor.
ENV-CP Staff	<p>Review design documents and requests as assigned.</p> <p>Inform the Project Lead of concerns regarding the facility engineering designs.</p>

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	<p>Recommend to Group Leader contracting items and services.</p> <p>Develop acceptance criteria.</p>
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, <i>Los Alamos National Laboratory Quality Assurance Program</i> requirements.
Project Lead	Verify that all materials and services meet acceptance criteria.
ENV-CP Staff	Follow established procedures for inspection and acceptance testing.

9.0 MANAGEMENT ASSESSMENT

The ENV-CP Group conducts internal management assessments of projects and programs in accordance with the requirements in [P328-3, *Management Assessment*](#) and [P328-4, *Management Observation and Verification*](#). Assessments of the program are documented and filed as records.

When violations of requirements are found during a management assessment, a nonconformance report is initiated in accordance with [P330-6, *Nonconformance Reporting*](#) for nonconforming items.

Nonconforming services or processes are tracked and documented in accordance with [P322-4, *Issues and Corrective Action Management*](#).

The following table lists responsibilities:

Who	What
Group Leader	Ensure management self-assessments for the MSGP program are conducted as specified in implementing procedures.
Project Lead	Ensure program management self-assessments are conducted.

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	<ul style="list-style-type: none"> • Approve audit schedules. • Provide input to the QA Specialist as to the content of audit. • Review audit reports for factual accuracy. Address all findings and implement corrective actions as appropriate.
QA Specialist	<ul style="list-style-type: none"> • Identify areas to be addressed during internal audits. • Contract with the Quality Management Group to perform annual internal audits. • Review audit procedures to ensure they meet the requirements in this section.
Team Members	<p>Cooperate with auditors by providing information, data, etc.</p> <p>Implement corrective actions as directed by the Project Lead.</p>

11.0 ATTACHMENTS

Attachment 1- MSGP Program Organization

Attachment 2 – Annual Reporting Form

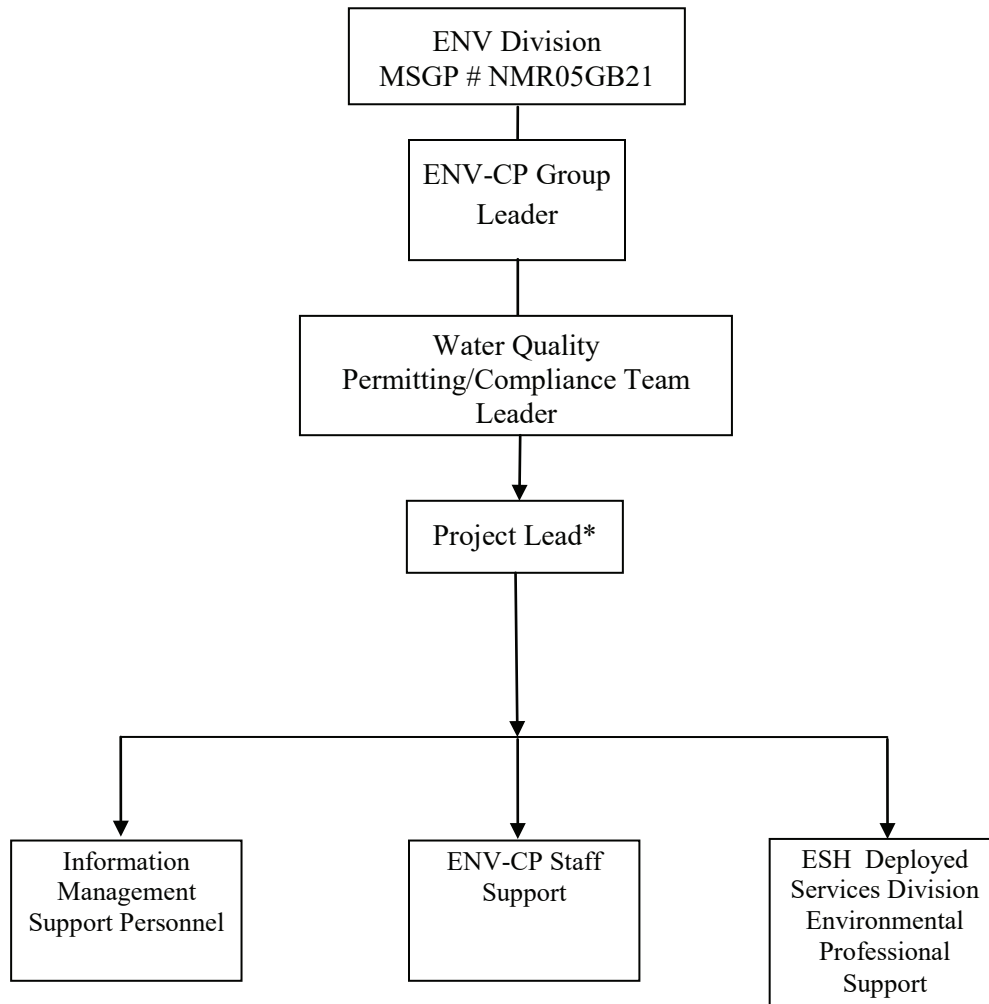
Attachment 3 – Routine Inspection Form

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

ATTACHMENT 1- MSGP PROGRAM ORGANIZATION

*Project Lead acts as liaison and will work directly with Team Leaders for staff assignments.

ATTACHMENT 2 – ANNUAL REPORTING FORM

NPDES Permit Tracking No.:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

[illegible]

2. NPDES Permit Tracking No.: | | | | |

3. Facility Physical Address:

a. Street:

b. City: | | | | | c. State: | | d. Zip Code: | | - | |

4. Lead Inspectors Name: _____ Title: _____

Additional Inspectors Name(s):

5. Contact Person:	
Title:	

[illegible]

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?
☐ YES ☐ NO

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 pollutants 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.:

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3. 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 control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☐ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

6. 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 submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?

☐ YES ☐ NO

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?

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NOTE: Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.

NPDES Permit Tracking No.:

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C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed 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 into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised c necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

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 the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:

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NOTE: Copy this page and attach additional pages as necessary

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO3. Have any control measures failed and require replacement? ☐ YES ☐ NO4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO3. Have any control measures failed and require replacement? ☐ YES ☐ NO4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO3. Have any control measures failed and require replacement? ☐ YES ☐ NO4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:

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D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action #

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 of

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 for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☐ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☐ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

5. Date problem identified:

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6. How problem was identified:

- ☐ Comprehensive site inspection
☐ Quarterly visual assessment
☐ Routine facility inspection
☐ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☐ NO

9. Date corrective action initiated:

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10. Date correction action completed:

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 or expected to be completed:

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11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

NPDES Permit Tracking No.:

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E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☐ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance 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.

Authorized Representative
Printed Name:

Title:

Signature: _____ Date Signed: _____

ATTACHMENT 3 – ROUTINE INSPECTION FORM

Name of Facility:		Responsible FOD (Name & Organization):	
Qualified Inspector(s): Others Present:		Inspection type: <input type="checkbox"/> Quarterly <input type="checkbox"/> Other	Date of inspection (MM/DD/YYYY): Time of inspection:
Weather: <input type="checkbox"/> Clear <input type="checkbox"/> Cloudy <input type="checkbox"/> Rain <input type="checkbox"/> Sleet <input type="checkbox"/> Fog <input type="checkbox"/> Snow <input type="checkbox"/> High Winds <input type="checkbox"/> Other: Temperature: _____ Is Inspection Being Conducted During a Storm Water Discharge? <input type="checkbox"/> Yes <input type="checkbox"/> No			
#	Structural Control Measures (BMP)s	Location	Operating Effectively (Yes or No)? If No, Need to Maintain (M), Repair (R) or Replace (RP)? Corrective Action Needed and Notes (Identify needed maintenance and repairs, or any failed control measures that need replacement)
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
Were additional BMPs or Control Measures implemented? <input type="checkbox"/> Yes <input type="checkbox"/> No Describe:			
Were previously identified conditions corrected before the next anticipated storm event? <input type="checkbox"/> Yes <input type="checkbox"/> No If No, describe reason:			
Area/Activity (Areas of Industrial Materials or Activities Exposed to Storm Water)	Inspected ?	Controls Adequate?	Corrective Action Needed and Notes (List area letter with comments below)
A. Material loading/unloading & storage areas			
B. Equipment operations & maintenance areas			
C. Fueling Areas			
D. Outdoor vehicle & equipment washing areas			
E. Waste Handling & disposal areas			
F. Erodible areas / construction			
G. Non-storm water / illicit connections			

H. Salt storage piles or pile containing salt			
I. Dust generation & vehicle tracking			
Are the SWPP Plan maintenance, schedules and procedures being implemented at the facility? <input type="checkbox"/> Yes <input type="checkbox"/> No			
Were any Corrective Actions initiated or completed? <input type="checkbox"/> Yes <input type="checkbox"/> No Describe:			
Are there any conditions requiring Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, List Number of Corrective Actions Required _____			
(Note – You need enter a Corrective Action in the MSGP Corrective Action Report database for each listed)			

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**ATTACHMENT 4 -- MSGP FACILITIES AND STORM WATER MONITORED OUTFALLS ASSOCIATED WITH INDUSTRIAL ACTIVITY 2011,
PERMIT NMR05GB21**

Location	Permitted Facility	Operation	Activity	Sector	Monitored Outfall	Canyon
TA-15-185	TA-15-185 PHERMEX	Vehicle Maintenance Shop	Vehicle Maintenance	P	15-PHRMX-1	• Water
TA-3-0034	TA-3-0034 Metal Shop	Fabricated Metals	Fabricated Metals	AA	3-MST-1	• Mortandad
TA-3-22	TA-3-22 Power & Steam Plant	Power Plant	Steam Electric Power	O	3-PSP-1	• Sandia
					3-PSP-5	•
					3-PSP-8	•
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	• Pajarito
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	• Pajarito
TA-54	TA-54 Area G	Area G -North Side	TSD	K	54-G-2	• Canada del Buey
TA-54	TA-54 Area G	Area G - South Side	TSD	K	54-G-3	• Pajarito
TA-54	TA-54 Area G	Area G - South Side	TSD	K	54-G-4	• Pajarito
TA-54	TA-54 Area L	Area L	TSD	K	54-L-1	• Canada del Buey
TA-54-38	TA-54 RANT	RANT	TSD	K	54-RANT-1	• Canada del Buey
TA-60	TA-60 Asphalt Batch Plant	Asphalt Batch Plant	Asphalt Paving	D	60-ABP-1	• Mortandad
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	P	60-RG-1	• Mortandad
				P	60-RG-3	• Sandia
				P	60-RG-8	• Sandia
TA-60-1	TA-60-1 Heavy Equipment Yard	Motor pool	Vehicle Maintenance	P	60-HEY-2	• Sandia
TA-60-2	TA-60-2 Warehouse	Motor pool	Vehicle Maintenance	P	60-WH-1	• Sandia
TA-9-28	TA-9-28 Heavy Equipment Maintenance	Motor pool	Vehicle Maintenance	P	9-HEM-1	• Pajarito

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 below Arroyo de la Delfe)	PCBs
TA-54 Area G	54-G-3			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 below Area-A Canyon)	PCBs
				Aluminum
				Gross Alpha
TA-3-39 & 102 Metal Shop	3-TS-1	NM-128.A_15	Two Mile Canyon (Pajarito to headwaters)	PCBs
				Aluminum
				Gross Alpha
TA-9-28 Heavy Equipment Maintenance	9-HEM-1	NM-128.A_16	Arroyo de la Delfe (Pajarito Canyon to headwaters)	Aluminum
				Mercury
				Gross Alpha
TA-60 Asphalt Batch Plant	60-ABP-1	NM-9000.A_042	Mortandad Canyon (within LANL)	Aluminum
TA-3-0034 Metal Shop	3-MST-1			Copper
TA-60 Roads and Grounds	60-RG-1			Gross Alpha
				PCBs
				Aluminum
				Copper
				Gross Alpha
				Mercury
TA-3-38 Metals Fab Shop	3-MFS-1	NM-9000.A_047	Sandia Canyon (Sigma Canyon to NPDES outfall 001)	PCBs
TA-3-22 Power & Steam Plant	3-PSP-1			Aluminum
TA-3-22 Power & Steam Plant	3-PSP-5			Copper
TA-3-22 Power & Steam Plant	3-PSP-8			Gross Alpha
TA-3-66 Sigma Complex	3-Sigma-6			Mercury
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			

ATTACHMENT 6 – ANALYTES BY INDUSTRIAL SECTOR

Permitted Facility	Monitored Outfall	Sector	Activity	Analyte	Monitoring Requirement
TA-3-0034 Metal Shop	3-MST-1	AA	Fabricated Metals	Aluminum	Quarterly Benchmark Monitoring (QBM)
TA-3-38 Metals Fab Shop	3-MFS-1			Iron	QBM
TA-3-39 & 102 Metal Shop	3-TS-1			Nitrate plus Nitrite Nitrogen	QBM
				Zinc	QBM
TA-60 Asphalt Batch Plant	60-ABP-1	D	Asphalt Paving	Oil and Grease	Effluent Limitations Guidelines (ELG)
				pH	ELG
				Total Suspended Solids	QBM and ELG
TA-3-66 Sigma Complex	3-Sigma-6	F	Primary Metals	Copper	QBM
				Zinc	QBM
TA-54 Area G	54-G-1	K	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 3-PSP-5 3-PSP-8	O	Steam Electric Power	Iron	QBM

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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 15: EPC-CP-QP-023 MSGP ROUTINE FACILITY INSPECTIONS

EPC-CP-QP-023Revision: **0**

Effective Date: 05/17/2018

Next Review Date: 05/17/2021

Environment, Safety, and Health Directorate**Environmental Protection and Compliance Division – Compliance Programs****Quality Procedure****MSGP Routine Facility Inspections****Document Owner/Subject Matter Expert:**

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REVISION HISTORY

Document Number and Revision <i>[Include revision number, beginning with Revision 0]</i>	Effective Date <i>[Document Control Coordinator inserts effective date]</i>	Description of Changes <i>[List specific changes made since the previous revision]</i>
EPC-CP-QP-023 R0	05/17/2018	New Document. Process formerly part of procedure ENV-RCRA-QP-022 R2, <i>MSGP Corrective Actions</i> .

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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, (Tracking Number NMR053195) 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.

Los Alamos National Security, LLC (LANS) inspectors and facility personnel are required to perform routine facility inspections for industrial stormwater discharge on LANL areas covered by the MSGP at least quarterly and document observations. Conditions (as described by the MSGP) found during an inspection, requiring a corrective action(s), are managed through EPC-CP-QP-022, *MSGP Corrective Actions*.

1.1 Purpose

Parts 3.1 and 3.1.2 of the MSGP contain specific requirements for conducting and documenting periodic industrial routine facility inspections. This procedure governs the activities of LANS 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 LANS personnel responsible for meeting the permit conditions on behalf of LANL industrial facilities covered by the MSGP. The MSGP requires periodic inspection of facilities and identification, documentation, and reporting of conditions, including those requiring corrective actions.

Inspections conducted under this procedure are documented using the Maintenance Connection Express™ (MC Express) web application on a tablet or notebook style computer. (In the event of electronic hardware or web application failure, personnel may use a printed hard copy to conduct the inspection.)

1.3 Applicability

This procedure applies to Environmental Protection and Compliance-Compliance Programs (EPC-CP) technical staff, Deployed Environmental Professionals (DEPs), and subcontractor personnel (as applicable) who conduct inspections and monitoring activities at MSGP regulated LANL facilities.

2.0 ROLES AND RESPONSIBILITIES

Specific roles and responsibilities for implementation of requirements contained in the MSGP are provided below.

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2.1 EPC-CP MSGP Stormwater Team

EPC-CP MSGP Stormwater personnel are fully knowledgeable of the specific regulatory requirements identified in the MSGP and are responsible for the following:

- Implementing this procedure;
- Performing routine facility inspections the last month or quarter of the year at regulated sites [depending on inspection frequency identified in site-specific Stormwater Pollution Prevention Plans (SWPPPs)];
- Performing “no exposure” site inspections once a year to ensure conditions of the “no exposure” exclusion are met;
- Performing routine facility inspections at inactive sites once a year;
- Identifying issues requiring a corrective action during any of the above inspections or assessments;
- Determining a condition of non-compliance;
- Notifying managers, or legal counsel of non-compliances;
- Modifying the site-specific MSGP Routine Facility Inspection Form to add new Best Management Practices (BMPs) or decommission retired ones;
- Training personnel to use MC Express;
- Performing a quality review of routine facility inspections and “no exposure” site inspections submitted in Maintenance Connection (MC); and
- Assisting customers with issues associated with MC Express.

2.2 Deployed Environmental Professionals

DEPs are responsible for the following.

- Implementing this procedure;
- Being educated (i.e., knowledgeable) of the requirements contained in site-specific SWPPPs within their assigned Facility Operations Directorate (FOD);
- Meeting qualification requirements identified in the Quality Assurance Project Plan EPC-CP-QAPP-MSGP, *Stormwater Multi-Sector General Permit for Industrial Activities Program*;
- Being trained on EPC-CP-QP-022, *Multi-Sector General Permit (MSGP) Corrective Actions*;
- Being trained on UTrain course number 53040, *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;
- Performing routine facility inspections, either monthly or quarterly throughout the year at regulated sites within their FOD [depending on inspection frequency identified in site-

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specific Stormwater Pollution Prevention Plans (SWPPPs)] and documenting results accurately;

- Acting as liaison between the FOD, Deployed Environment, Safety, and Health Services (DESHS) Manager and facility/operations personnel to ensure corrective actions are addressed appropriately by overseeing maintenance and/or installation of additional controls;
- Educating appropriate facility/operations personnel on the MSGP and site-specific SWPPPs so they successfully implement the conditions of the permit; and
- Notifying EPC-CP MSGP stormwater personnel when additional or substitute BMPs have been installed or old BMPs have been removed so the site-specific MSGP Routine Facility Inspection Form can be modified.

2.3 EPC-CP Stormwater Permitting and Compliance Team Leader

The EPC-CP Stormwater Permitting and Compliance Team Leader is responsible for compliance oversight relative to the MSGP. The Team Leader ensures adequate resources needed to implement the regulatory requirements identified in the MSGP are identified and environmental risks are assessed. The Team Leader will notify upper management of these required resources or environmental risks, as deemed necessary. In the event there is a dispute regarding the regulatory requirements contained in the MSGP, the Team Leader makes the final determination of the required action. The Team Leader notifies upper management of instances of non-compliance with the permit.

2.4 EPC-CP Group Leader

The EPC-CP Group Leader or designee is responsible for ensuring there are adequate resources to implement the regulatory requirements identified in the MSGP. The Group Leader or Team Lead also acts as the duly authorized signatory that certifies the Annual Report, MSGP Routine Facility Inspections, or “no exposure” site inspections conducted by EPC-CP personnel. The Group Leader notifies upper management of instances of non-compliance with the permit or other identified environmental risk.

2.5 DESHS Manager

The DESHS manager works with programmatic entities and the FOD to identify adequate resources for their industrial facilities to ensure permit requirements can be implemented. The DESHS Manager is responsible for the performance of DEPs under their management and to maintain trained and qualified DEPs. They also provide oversight by ensuring that industrial facilities complying with the MSGP and will notify upper management of instances of non-compliance with the permit or other identified environmental risk.

3.0 PRECAUTIONS AND LIMITATIONS

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

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Field inspections may be discontinued during periods or conditions that make sites dangerous for worker safety or prevent personnel from safely accessing sites (e.g., weather-related events such as flash floods, flooding, lightning, wildfires, hail, icy roads, deep snow, or LANL operations such as firing shots or burns).

4.0 PREREQUISITE ACTIONS

4.1 Planning and Coordination

1. Schedule work to be completed by the target date appearing on the inspection or as requested by the MSGP program lead if an inspection 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. Obtain any necessary additional paperwork before conducting this work, including SWPPPs and maps (as necessary).

4.2 Tools and Equipment

Ensure the following equipment is available.

- Sturdy hiking boots or steel toed shoes with soles that grip and other facility specific PPE as needed
- Cell phone (Only government cell phones are allowed in secure areas. See <https://int.lanl.gov/policy/documents/P217.pdf> for requirements for using portable electronic devices on Laboratory property.)
- Copy of this procedure
- Copy of facility specific SWPPP and map(s) (as needed)
- Current electronic or paper inspection form EPC-CP-Form-1020, *MSGP Routine Facility Inspection*
- LANS issued tablet or notebook style computer with Safari web browser and Blackberry UEM™ app (see <https://int.lanl.gov/policy/documents/P217.pdf> for requirements for using portable electronic devices on Laboratory property)
- Necessary access keys

5.0 MSGP ROUTINE FACILITY INSPECTIONS

MSGP routine facility inspections are conducted by the DEP or other qualified facility personnel (as defined in the MSGP or as determined by MSGP program lead) during periods when the facility is in operation and during standard operating hours. The inspections are performed on the following facility areas:

- Areas where industrial materials or activities are exposed to stormwater;

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- Areas identified in the SWPPP and those that are potential pollutant sources;
- Areas where spills and leaks have occurred in the past;
- Discharge points; and
- Control measures used to comply with the effluent limits contained in the MSGP.

Routine facility inspections are conducted at least quarterly; however, some facilities may conduct monthly inspections (as specified in the facility specific SWPPP). At least once each calendar year, the routine facility inspections must be conducted during a period when stormwater discharge (either rain or snow) is occurring. During the inspection you must look for the following:

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

Conditions requiring corrective action identified during an inspection, monitoring, or other means must be entered into the MSGP Corrective Action Report database by the DEP(s), EPC-CP stormwater personnel and/or other qualified facility personnel (as defined in the MSGP or as determined by MSGP program lead). Follow the process in EPC-CP-QP-022, *MSGP Corrective Actions* to address issues found during an inspection.

If the industrial facility is inactive and unstaffed and there are no industrial materials or activities exposed to stormwater, routine inspections may not be required. A determination of whether a facility is inactive or unstaffed is made in coordination with stormwater personnel from EPC-CP as there are specific documentation and certification requirements that have to be met prior to discontinuing routine inspections. Such a facility is only required to conduct an annual site inspection.

If the industrial facility is eligible for a “no exposure” exclusion routine inspections are no longer required. A condition of “no exposure” exists when all industrial materials and activities are protected by a storm resistant shelter (e.g., moved to an indoor location) to prevent exposure to rain, snow, snowmelt, and/or runoff. A determination of whether a facility is eligible for “no exposure” status is made in coordination with stormwater personnel from EPC-CP as there are specific documentation and certification requirements that have to be met prior to discontinuing routine inspections. Such a facility is only required to conduct an annual site evaluation and recertification every five years.

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5.1 Conducting the Inspection

See Attachment 1 for screen shot examples of EPC-CP-Form-1020, *MSGP Routine Facility Inspection* in MC Express. See Attachment 2 for a crosswalk of the inspection form in hard copy format.

Some terminology varies between the MC Express software and the Maintenance Connection desktop software. The “Complete” option in MC Express is the same as a “Yes” answer; the “Failed” option in MC Express is the same as a “No” answer. Maintenance Connection desktop and hard copy (printed) work orders use “Yes” and “No” terminology.

If the inspector needs space, additional comments can be entered in the “Labor Report” field (see Section 5.2) when the work order is updated to “Complete” status in MC Express. If completing a hard copy enter additional comments in the “Labor Report” field at the bottom of the form.

1. Use the Internet Explorer web browser on a tablet or similar portable computer and navigate to <http://express.maintenanceconnection.com>. Log into the MC Express application using your login credentials.
2. Open the inspection form for the location to be inspected and select “Tasks” to navigate to the Tasks page.

Note: Each item number listed in red font below corresponds to a numbered box on both screen shots (Attachment 1) and hard copy format (Attachment 2).

3. **Item 1:** Observe the weather at time of inspection. Describe the weather and record the temperature in the “Comments” field. Document this task is or is not completed by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”.

CAUTION

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

4. **Item 2:** Observe and document the facility is free of **new** discharges of pollutants **since the last inspection** by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe any new discharges and the specific location in the “Comments” field of the task line.
5. **Item 3:** If the response to **Item 2** is “Complete” click the expand arrow located on the right side of this task line and change the “N/A” line to “Yes”. If the response to **Item 2** is “Failed” document any CAR previously initiated for the discharge by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”.
6. **Item 4:** Observe and document the facility is free of discharges of pollutants at the time of inspection by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe any pollutant discharge and the specific location in the “Comments” field of the task line.

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7. **Item 5:** Observe and document the facility is free of evidence of pollutants entering the drainage system OR the potential for pollutants entering the drainage system by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe any discharge or potential discharge and the specific location in the “Comments” field of the task line.
8. **Item 6:** Observe and document the outfall does not have any **new** evidence of erosion **since the last inspection** by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe any erosion observed in the “Comments” field of the task line.
9. **Item 7:** Observe and document all flow dissipation devices are operating effectively and are not in need of repair by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe any non-functional status of devices in the “Comments” field of the task line.
10. **Item 8:** Observe and document the outfall is free of evidence of pollutants in the discharge and/or the receiving water by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe any pollutants observed in the “Comments” field of the task line.
11. If the location has more than one outfall, complete Steps 8 through 10 for each outfall shown on the work order.
12. **Item 9:** Observe and document each control measure is operating effectively by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe any non-operational condition of the control measure (e.g., erosion, damage, etc.) and if the control measure needs maintenance, repair, or replacement in the “Comments” field of the task line.
13. If the location has more than one control measure complete Step 12 for each control measure shown on the work order.
14. **Item 10:** Observe and document each sector of NPDES specified industrial area/activity (e.g., metal fabrication; foundry operations; power generation; asphalt production; fabricating timber products; material recycling; warehouse and transportation activity; treatment and storage of hazardous waste) is inspected for exposure to stormwater by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”.

Determine if the control measures associated with each industrial area/activity are appropriate for the activity, effectively controlling stormwater exposure, and operating. Describe any non-operational condition of the control(s) and needed maintenance or a description of corrective actions in the “Comments” field of the task line.
15. If the facility has more than one sector of NPDES specified industrial area/activity complete Step 14 for each industrial area/activity shown on the work order. If an industrial activity does not apply to the facility click the expand arrow located on the right side of the task line and change the “N/A” line to “Yes”.

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16. **Item 11:** Observe and document the facility is free of discharges of any non-compliance not documented elsewhere on the inspection form by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe any additional incidences of non-compliance in the “Comments” field of the task line.
17. **Item 12:** Observe and document the facility meets the MSGP requirements with existing control measures by clicking the expand arrow located on the right side of the task line and changing the “Complete” to “Yes”. If additional control measures are needed to comply with the Permit, clicking the expand arrow located on the right side of the task line and changing the “Failed” to “Yes” and describe the control measures in the “Comments” field of the task line.
18. When all task lines have been completed, make sure you have clicked the “Save” bar at the bottom of the page.
19. Click the “Back” arrow button in the upper left hand corner to exit the work order Tasks page and return to the Work Order Summary page.

Always log out of MC Express when you have finished work OR if work is interrupted.

5.2 Completing the Inspection Form in MC Express

See Attachment 1 for screen shot examples of EPC-CP-Form-1020, *MSGP Routine Facility Inspection* in MC Express.

1. Click the checkered flag in the upper right corner of the work order Summary page.

CAUTION

MC Express automatically changes the work order status to “Closed” and auto-populates the date and time fields.

2. **Item 13:** Click on the expand arrow located on the right side of the “New Status” field and select “Completed” from the available dropdown menu. Ensure the date and time auto-populated are the date and time the on-site **field inspection was completed** (not the date/time the form was filled out).

If these fields need to be updated, click the “Date” field to modify it. Make necessary adjustments using the available timestamp application and click “Set” to apply changes.

3. **Item 14:** The inspector types in his/her name in the “Labor Report Update” field.
Any additional notes, observations, or site conditions not documented in a task line “Reading” or “Comments” field can be documented in the “Labor Report Update” section.
4. Scroll down the page to the “Signature” bar and click the expand arrow on the left side of the bar to open the “Signature” field.
5. **Item 15:** Capture an electronic signature by drawing with a finger on the tablet screen. The field inspector is certifying that the information submitted is “true, accurate, and complete” by electronically signing work order.

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Note: If using MC Express on a desktop screen (not a tablet), the mouse is used to draw a signature.

6. Click on the “Save” bar at the bottom of the page to close the “Signature” field.
7. Click on the “Back” button located in the upper left hand corner to return to the “My Open Work Orders” page.
8. Once you have completed an inspection, click on the Menu button again, and then click the “Logout” bar. Close the browser. All work will be automatically uploaded from the MC Express application to the MC database.

Always log out of MC Express when you have finished work OR if work is interrupted.


5.3 Completing the Inspection Form on Hardcopy

See Attachment 2 for a crosswalk of EPC-CP-Form-1020, *MSGP Routine Facility Inspection* to hard copy format.

1. **Item 13:** Write in the date and time the **inspection was completed** and **not the date/time the form was filled out**. If an inspection needs to be performed over multiple days, note the date and time the inspection began in the Labor Report field.
2. **Item 14:** The field inspector prints his/her name.
3. **Item 15:** The field inspector reviews the inspection form for accuracy and certify that the information submitted is “true, accurate, and complete” by signing his/her name and dating when the form was signed.

5.4 Completing the Certification Statement

Follow Steps 1 through 5 in this section if the inspection form was completed electronically (see Attachment 1). If the inspection form was completed on a hard copy form skip to Step 6.

1. Using the Internet Explorer web browser on a desktop computer, navigate to <http://www.maintenanceconnection.com>. Log into the MainConn desktop application using your login credentials.
2. Click “Open” in the tool bar at the top of the page to open the MainConn module selections. Click on the “Work Orders” module.
3. Click on the “Search” tab at the top left of the page and enter the work order number in the “Search Value” field. Click the arrow to the right of the “Search Value” field to open the work order in the right split screen.
4. Click on the “Report” tab at the top of the page and click the “Work Order Statement” sub-tab.
5. Click the Tools drop down menu  in the top right corner of the page and select “Print” from the options. The print dialog box will open. Select the print options as appropriate for your local printer.

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6. **Item 16:** Obtain a printed name and title, signature, and date on the certification statement. The routine facility inspection form must be certified with a signature from a manager that meets the definition of a signatory in MSGP Permit Section B.11.A (e.g., FOD, Operations Manager, DSESH Group Leader, EPC-CP Group Leader, EPC-CP Team Lead). The manager is certifying the information submitted is “true, accurate, and complete” by signing the form.
7. Attach the completed, signed, and certified inspection form to the facility SWPPP.

6.0 TRAINING

The following personnel require training before implementing this procedure.

- DESHS Group and Team Leaders
- EPC-CP MSGP stormwater compliance personnel
- DEPs
- Other LANL or subcontract personnel identified as being required to conduct stormwater assessments as part of their job duties

For EPC-CP staff, the training method for this procedure is “self-study” (reading). Other participating groups may require training documentation pursuant to local procedures.

Personnel performing this procedure will be familiar with the most current versions of the following procedures.

- EPC-CP QAPP-MSGP *Quality Assurance Project Plan for the Stormwater Multi-Sector General Permit for Industrial Activities*
- EPC-CP-QP-022, *Multi-Sector General Permit (MSGP) Corrective Actions*
- Training Course 53040, *MSGP Routine Inspections OJT*

7.0 RECORDS

MSGP Routine Facility Inspection forms are signed and certified by individual facilities. These completed forms are maintained in the facility’s SWPPP and managed by the facility’s document management system. The MSGP team may obtain a copy for reference purposes.

8.0 DEFINITIONS AND ACRONYMS

See LANL [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).

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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](#).

EPC-CP	Environmental Protection and Compliance – Compliance Programs
DEP	Deployed Environmental Professional
DESHS	Deployed Environment, Safety, and Health Services
IWD	Integrated Work Document
FOD	Facility Operations Director
LANL	Los Alamos National Laboratory
LANS	Los Alamos National Security, LLC
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.

10.0 ATTACHMENTS

Attachment 1: *Screenshot Example of EPC-CP-Form-1020, MSGP Routine Facility Inspection in MC Express*

Attachment 2: *Crosswalk of EPC-CP-Form-1020, MSGP Routine Facility Inspection to Hard Copy Format*

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ATTACHMENT 1: SCREENSHOT EXAMPLE OF EPC-CP-FORM-1020, *MSGP ROUTINE FACILITY INSPECTION* IN MC EXPRESS

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The screenshot shows the MC Express mobile application interface. At the top, there is a blue header with a back arrow, the text 'MC Express', and a menu icon. Below the header, a grey bar displays 'WORK ORDER: MSGP-RI-52112' and 'Tasks'. The main content area is divided into two sections: 'Weather Information' and 'Within the Facility Boundary'. The 'Weather Information' section contains a single task (1) with a flag icon, a number '20' in a red box, and the text 'Describe the weather at time of inspection and document the temperature (F°)'. The 'Within the Facility Boundary' section contains four tasks (2, 3, 4, 5), each with a flag icon, a number in a red box, and a description. Task 2: 'Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe.' Task 3: 'If "No" has a CAR been previously initiated for this new discharge?' Task 4: 'Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.' Task 5: 'Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.' At the bottom, there is a blue bar with a 'Refresh' button, a grid icon, and a 'List' button.

The screenshot shows the MC Express mobile application interface, continuing from the previous section. The header and work order information are the same. The main content area is divided into two sections: 'Weather Information' and 'Within the Facility Boundary'. The 'Within the Facility Boundary' section contains four tasks (2, 3, 4, 5), each with a flag icon, a number in a red box, and a description. Task 2: 'Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe.' Task 3: 'If "No" has a CAR been previously initiated for this new discharge?' Task 4: 'Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.' Task 5: 'Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.' Below this, there is a section titled 'Outfall Inspection (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comment)'. This section contains five tasks (6, 7, 8, 120, 130, 140), each with a flag icon, a number in a red box, and a description. Task 6: 'Free of Evidence of Erosion? If "No", describe. Asset: [073] Monitored Outfall' Task 7: 'Flow Dissipation Devices Operating Effectively? If "No", describe. Asset: [073] Monitored Outfall' Task 8: 'Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe. Asset: [073] Monitored Outfall' Task 120: 'Free of Evidence of Erosion? If "No", describe. Asset: [074] Substantially Identical Outfall' Task 130: 'Flow Dissipation Devices Operating Effectively? If "No", describe. Asset: [074] Substantially Identical Outfall' Task 140: 'Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe. Asset: [074] Substantially Identical Outfall' At the bottom, there is a blue bar with a 'Refresh' button, a grid icon, and a 'List' button.

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ATTACHMENT 1: SCREENSHOT EXAMPLE OF EPC-CP-FORM-1020, MSGP ROUTINE FACILITY INSPECTION IN MC EXPRESS (CONT.)

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MC Express

WORK ORDER: MSGP-RI-52112

Tasks

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

160
Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement. →
Asset: [0300503040002] Asphalt Berm

170
Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement. →
Asset: [0300504060001] Rip Rap

180
Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement. →
Asset: [0300503200003] EnviroSoxx w/ MetallLoxx

Refresh

List

MC Express

WORK ORDER: MSGP-RI-52112

Tasks

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

200
Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe. →

210
Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe. →

220
Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe. →

230
Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe. →

Refresh

List

MC Express

WORK ORDER: MSGP-RI-52112

Tasks

Non-Compliance

390
Free of incidents of observed non-compliance not already identified above? If "No" describe. →

Additional Control Measures

410
Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed. →

Refresh

List

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ATTACHMENT 1: SCREENSHOT EXAMPLE OF EPC-CP-FORM-1020, MSGP ROUTINE FACILITY INSPECTION IN MC EXPRESS (CONT.)

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MC Express

WORK ORDER: MSGP-RI-52112

Summary

[03005] TA-3-38 Carpenter Shop
RG121.9
Issued / Completed

Hard Copy Example

- Tasks 34
- Assignments 1
- Labor 0
- Parts 0
- Other Costs 0
- Attachments 2
- Asset History 30

More Work Order Detail...

Refresh List

MC Express

WORK ORDER: MSGP-RI-52112

Status Update

Issued / Completed

New Status **13**

Completed

Date

10/25/2017 04:22 PM

Percent Complete 100%

Labor Report Update **14**

Select Comments to Add.....

Jane Doe Admin

Cancel Save

MC Express

WORK ORDER: MSGP-RI-52112

Status Update

Signature **15**

(Remove)

Jane Doe Admin

Cancel Save

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ATTACHMENT 2: CROSSWALK OF EPC-CP-FORM-1020, MSGP ROUTINE FACILITY INSPECTION TO HARD COPY FORMAT

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Los Alamos National Lab - ADESH

Work Order MSGP-RI-52112

MSGP Routine Inspection
Printed 10/25/2017 - 4:07 PM (Duplicate Copy)


Maintenance Details					
Requested By: Admin, Jane on 10/25/2017 Taken By: Admin, Jane Procedure: MSGP Routine Facility Inspection (EPC-CP-Form-1020.1) Last PM: N/A Reason: EXAMPLE MSGP Routine Facility Inspection Special Instructions: NMR053195	Target: 12/31/2020 Priority/T ype: / Inspection Department: Utilities and Infrastructure	<div style="display: flex; justify-content: space-between;"> <div> MSGP Program RG121.9 TA-3-38 Carpenter Shop </div> <div> Contact: Admin, Jane Phone: 665-1234 </div> </div>			

Tasks						
	#	Description	Meas.	No	N/A	Yes
		Weather Information				
1	20	Describe the weather at time of inspection and document the temperature (F).		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Within the Facility Boundary				
2	40	Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "Failed" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	50	If "No" has a CAR been previously initiated for this new discharge?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	60	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5	70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Outfall Inspection (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comment)				
6	90	Monitored Outfall [073] Free of Evidence of Erosion? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7	100	Monitored Outfall [073] Flow Dissipation Devices Operating Effectively? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8	110	Monitored Outfall [073] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	120	Substantially Identical Outfall [074] Free of Evidence of Erosion? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	130	Substantially Identical Outfall [074] Flow Dissipation Devices Operating Effectively? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	140	Substantially Identical Outfall [074] Free of Evidence of Pollutants in Discharges and/or Receiving Water? If "No", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Control Measures (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comments).				
9	160	Asphalt Berm [0300503040002] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	170	Rip Rap [0300504060001] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	180	EnviroSoxx w/ MetalLoxx [0300503200003] Control Measure is operating effectively? If "No" describe condition & need for Maintenance, Repair, or Replacement.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Area/Activity exposed to stormwater (identify needed maintenance or a description of corrective actions in relevant task comment).				
10	200	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	210	Transfer areas for substances in bulk: controls adequate (appropriate, effective, and operating)? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	220	Product/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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**ATTACHMENT 2: CROSSWALK OF EPC-CP-FORM-1020, MSGP ROUTINE FACILITY INSPECTION TO
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230	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
240	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
250	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
260	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
270	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
280	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
290	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
300	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
310	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
320	Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
330	Salt storage piles or pile containing salt: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
340	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
350	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
360	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
370	Sector A [03005-] Wood processing, transport or treated wood storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-Compliance				
11 390	Free of incidents of observed non-compliance not already identified above? If "No" describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Additional Control Measures				
12 410	Are permit requirements satisfied with existing control measure(s)? If "No" describe additional control measures needed.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Labor Report				
13	Completed: 10/25/2017 10:08:00 AM			
14	Report: Jane Doe Admin			
15	 Signature / Name	10/25/2017 Date	 Signature / Name	 Date
I confirm the information as recorded is true, accurate and complete.				

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**ATTACHMENT 2: CROSSWALK OF EPC-CP-FORM-1020, MSGP ROUTINE FACILITY INSPECTION TO
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CERTIFICATION STATEMENT

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

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

16 Print name and title: _____

Signature: _____ Date: _____

EPC-CP-Form-1020.1 03/2018

ATTACHMENT 16: EPC-CP-QP-022 MSGP CORRECTIVE ACTIONS

EPC-CP-QP-022Revision: **3**

Effective Date: 12/20/2018

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

MSGP Corrective Actions

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Revision History

Document Number and Revision <i>[Include revision number, beginning with Revision 0]</i>	Effective Date <i>[Document Control Coordinator inserts effective date]</i>	Description of Changes <i>[List specific changes made since the previous revision]</i>
0	08/10	New Document.
1	11/10	Incorporated EPC-CP-QP-062 <i>MSGP Routine Inspections</i> 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.

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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 (https://msgp-car.lanl.gov/forms/frmservlet?config=msgp_car). 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 <https://int.lanl.gov/policy/documents/P217.pdf> 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 <https://int.lanl.gov/policy/documents/P217.pdf> 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 [LANL Stormwater BMP Manual](#).

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] **IF** any of the following conditions are identified,
THEN 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 non-stormwater 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] **IF** a condition exists that requires corrective action, as described in Section 5.1 [1], **THEN** 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] **IF** 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), **THEN**:

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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] **IF** completion of the corrective action is infeasible within the 14-day timeframe,
THEN:
 - [a] Document the reasoning in the database.
 - [b] Provide a schedule for completion of the corrective action in the database.

NOTE

Completion of the corrective action cannot exceed 45 days from the time of discovery without having to notify EPA. These time intervals are not grace periods, but are schedules considered reasonable for documenting finding(s) and for making repairs and improvements. They are included in the MSGP to ensure that the conditions prompting the need for these repairs and improvements are not allowed to persist indefinitely. In no instance will the corrective action remain open indefinitely (Part 4.3.2 of the MSGP).

5.2.3 Corrective Action Documentation

DEP and/or EPC-CP

- [1] Document existence of any of the conditions listed in Section 5.1 [1] of this procedure in the CAR database within 24 hours of becoming aware of such condition (or if identified late in the work day, by the following work day).

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[2] Include the following information in the documentation:

- Description of the condition triggering the need for corrective action review. For any spills or leaks, include the following information:
 - a description of the incident including material, date/time, amount, location, and reason for spill;
 - any leaks, spills or other releases that resulted in discharges of pollutants to waters of U.S., through stormwater or otherwise;
- Date the condition was identified; and
- Description of immediate actions taken (Part 4.3.1 of the MSGP) to minimize or prevent the discharge of pollutants. For any spills or leaks, include response actions, the date/time clean-up was completed, notifications made (if any), and staff involved. Also include any measures taken to prevent the reoccurrence of such releases (Part 2.1.2.4 of the MSGP).

[3] Provide the dates when each corrective action was initiated and completed (or is expected to be completed).

- [a] If applicable, document why it is infeasible to complete the necessary installations or repairs within the 14-day timeframe, and
- [b] Document your schedule for installing the controls and making them operational as soon as practicable after the 14-day timeframe.
- [c] **IF** 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 of 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 https://msgp-car.lanl.gov/forms/frmservlet?config=msgp_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 hbenson@lanl.gov 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 performing 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 hbenson@lanl.gov 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 or 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] **IF** 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 https://msgp-car.lanl.gov/forms/frmservlet?config=msgp_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 https://msgp-car.lanl.gov/forms/frmservlet?config=msgp_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] **IF** not,
THEN 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] **IF** 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] **IF** 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*.

BMP	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
Y	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.
- [Unites States Environmental Protection Agency \(EPA\) National Pollutant Discharge 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](#)
- [SD100, Integrated Safety Management System](#)
- [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

MSGP_CORRECTIVEACTIONREPORT

Corrective Action Header Corrective Action Details

NPDES MSGP CORRECTIVE ACTION REPORT Id. Number : 1150 (Assigned by computer)

1 * Name of Facility : TA-60-1 Heavy Equipment Yard List

2 * Date problem was identified : 05/19/2017 09:00 * Date of Notification to EPC-CP : 05/19/2017 12:00 3

4 * FOD Responsible for CA (Name & Org) : UI Erickson Andrew W

5 Describe Specific Evaluation Location : Trench drain east of the high bay that drains to the oil water separ

6 * Inspector Z-Number : 123456 Doe, Jane EPC-CP

7 * Person Identifying Condition Z-Number : 123456 Doe, Jane EPC-CP

Date Format Must be entered as MM/DD/YYYY HH24:MI

8 Status: 1 A new corrective action ? Annual Report ID (s):

9 Void Comments:

* required fields

10

Enter New Corrective Action Back To Record Selection Save Cancel

Prev Rec. Next Rec. Print Summary

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Attachment 1 – Screenshot Example of CAR Database (cont.)

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Corrective Action Details tab

Action Edit Query Block Record Field Help Window

MSGP_CORRECTIVEACTIONREPORT

Corrective Action Header Corrective Action Details

*3. Identify the condition triggering the need for this review: If other, (describe here):

11 Control measures not properly operated or maintained List 12

*4. Briefly describe the nature of problem identified: (e.g., Erosion problem identified during inspection).

13 The trench drain east of the high bay at TA-60 HEY that drains to an oil/water separator was not draining during a precipitation event. This is a repeat issue that was previously identified on 3/22/2017 (see CAR #1067), when discharge resulted in an oily sheen at SIO 025.

*6. How problem was identified: If other, (describe here):

14 Other (describe) : List During monitoring after a storm event 15

*7. Description of corrective action taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications, repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

16 On 05/19/2017, HEY personnel pumped water from the trench drain into storage tanks to prevent overflow and release and removed sediment from the trench drain and placed into drums. An on-site supervisor submitted FSR to unclog the line was submitted. 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.

17 8. Was the problem identified at an outfall that is Substantially Identical? Yes/No : Y

18 9. Which SIO Affected? 021, 023, 024, and 025

19 10. If yes, provide documentation of how corrective action taken is appropriate for all related SIOs:

5/19/2017: Temporarily pumping water will prevent discharge from reaching the SIOs. 6/5/2017: Unclogging the trench drain and maintenance on the oil/water separator will prevent unauthorized discharges such as oil.

20 * 11. Did/will this corrective action require modification of your SWPPP ? Yes/No : Y

21 * 12. Date corrective action initiated (MM/DD/YYYY HH24:MI): 05/19/2017 14:00 OR expected completion :

22 * 13. Date corrective action completed (MM/DD/YYYY HH24:MI): 06/05/2017 16:00

23 14. If corrective action is not or will not be completed within 14 days of discovery, describe any remaining steps and the formal schedule necessary to complete the corrective action:

MSS and subcontractor are scheduled for 06/05/2017 AM to unclog trench drain and perform maintenance on the oil/water separator. Schedule exceeded 14 days due to no standing maintenance contract on the oil/water separator being in place. Standing maintenance contract is now in place.

24 15. Date EPA Notified of Intent to Exceed 45 Days (MM/DD/YYYY HH24:MI):

* required fields

List Values Prev Rec. Next Rec. BackToRecordSelection 25 Save Cancel

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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*)

Valid MSGP Facilities

Find:

Msgp_Facility_Desc

- TA-14-23 OBOD
- TA-15-185 PHERMEX
- TA-15-313 Machine Shop
- TA-16-0388 Burning Ground
- TA-16-0399 Burning Ground
- TA-22-52 Machine Shop
- TA-3-22 Power & Steam Plant
- TA-3-30 Warehouse
- TA-3-32 Metal Shop
- TA-3-34 Metal Shop
- TA-3-38 Carpenter Shop
- TA-3-38 Metals Fab. Shop
- TA-3-39 & 102 Metal Shop
- TA-3-66 Sigma Facility
- TA-33-113 Machine Shop
- TA-33-39 Machine Shop
- TA-35-125 Machine Shop
- TA-35-2 Machine Shop
- TA-36-8 Minie
- TA-39-57 OBOD
- TA-39-6 OBOD
- TA-46-31 Machine Shop
- TA-46-77 Machine Shop
- TA-48-8 Machine Shop
- TA-50-37 WCRRF
- TA-50-54 Metal Shop
- TA-50-69 WCRRF
- TA-53-16 Machine Shop
- TA-53-18 Machine Shop
- TA-53-2 Machine Shop
- TA-53-22 Machine Shop
- TA-53-26 Machine Shop
- TA-53-39 Shop and Storage Building
- TA-54 Area G
- TA-54 Area L
- TA-54 Maintenance Facility W
- TA-54 RANT
- TA-55 Plutonium Facility
- TA-55-314 Warehouse
- TA-60 Asphalt Batch Plant
- TA-60 MRF
- TA-60 Roads and Grounds
- TA-60-1 Heavy Equipment Yard
- TA-60-2 Warehouse
- TA-63 Transuranic Waste Facility
- TA-9-28 Heavy Equipment Maintenance Operations Facility

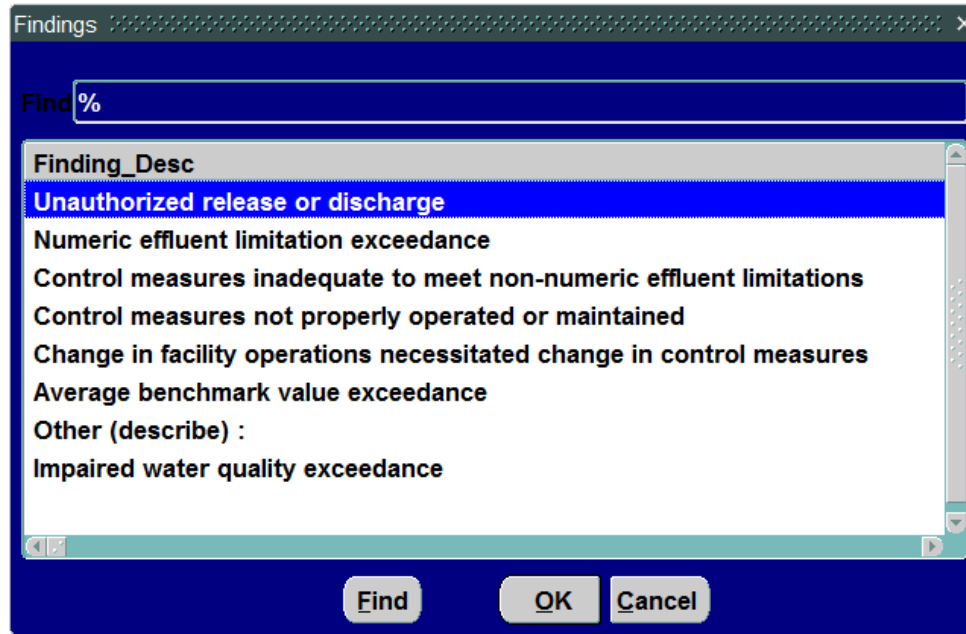
Find OK Cancel

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

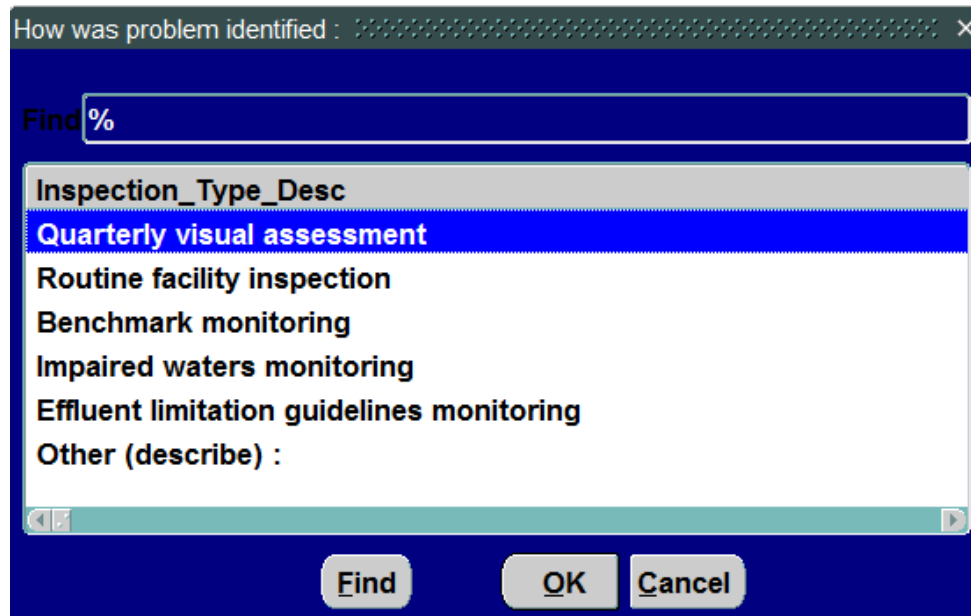
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Finding Description/Condition Triggering Need for Review (*Item 11 on Attachment 1 Screenshot*)



The 'Findings' dialog box has a title bar with 'Findings' and a close button. It contains a search field labeled 'Find %' with a '%' symbol. Below the search field is a list box titled 'Finding_Desc'. The list contains the following items: 'Unauthorized release or discharge' (highlighted in blue), 'Numeric effluent limitation exceedance', 'Control measures inadequate to meet non-numeric effluent limitations', 'Control measures not properly operated or maintained', 'Change in facility operations necessitated change in control measures', 'Average benchmark value exceedance', 'Other (describe) :', and 'Impaired water quality exceedance'. At the bottom of the dialog are three buttons: 'Find', 'OK', and 'Cancel'.

Inspection Type/How Problem was Identified (*Item 14 on Attachment 1 Screenshot*)



The 'How was problem identified' dialog box has a title bar with 'How was problem identified : ' and a close button. It contains a search field labeled 'Find %' with a '%' symbol. Below the search field is a list box titled 'Inspection_Type_Desc'. The list contains the following items: 'Quarterly visual assessment' (highlighted in blue), 'Routine facility inspection', 'Benchmark monitoring', 'Impaired waters monitoring', 'Effluent limitation guidelines monitoring', and 'Other (describe) :'. At the bottom of the dialog are three buttons: 'Find', 'OK', and 'Cancel'.

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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 CAR database.

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 to the start of work the operator noticed the forklift was leaking hydraulic fluid from the line to the mast. Approximately 4 to 6 oz leaked onto the asphalt. The Operation Center was notified and the WMC and ENV. The Nuc Operators placed spill pads under the leak. FSR#182723 was entered to repair forklift and apply microblaze. At 1702 MSS personnel applied micro blaze to the spill. On 1/18/2018 the WMC collected all spill pads and managed them accordingly.

Status: The corrective action was initiated on 01/17/2018 and was completed on 01/17/2018.

Click [HERE](#) to access the list of MSGP corrective action(s) not yet completed for EWMO.

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.

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 must take the minimum additional time necessary, provided that you notify Region 6 of the Environmental Protection Agency:

- of your intent to exceed 45 days,
- your rationale for an extension, and
- a completion date.

To assist the preparation of this notification, as a responsible individual, you must contact the EPC-CP Project Lead at 667-1312 for any corrective action that remains open 35 days or more, and provide a formal status of the progress for each corrective action. By day 40, the DEP must provide the EPC-CP Project Lead the rationale for potentially exceeding the required 45-day timeframe and a proposed completion date for each associated corrective action. The DEP must also amend the rationale and completion date in the CAR database.

An extension request must be submitted to Region 6 of the U.S. Environmental Protection Agency by EPC-CP personnel prior to day 45 for final corrective actions not completed or estimated to be completed within 45 days of discovery.

The responsible individual must ensure compliance with the proposed completion schedule.

These intervals are not considered grace periods, but are defined schedules to ensure the conditions requiring corrective action do not persist indefinitely.

Where corrective actions result in changes to controls or any procedures documented in the facility's Storm Water Pollution Prevention Plan (SWPPP), the DEP must modify the SWPPP accordingly within 14 calendar days of completing corrective action work.

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Attachment 4 – Example Weekly Notification of Outstanding Corrective Action Findings

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

Sent: Monday, January 01, 2018 10:00 PM

To:

Cc:

Subject: Weekly Notification of Outstanding NPDES MSGP Corrective Action finding(s)

This email is generated automatically by the National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit (MSGP) Corrective Action Report (CAR) database to provide notification of discovery of a new condition requiring corrective action. As the recipient of this notification, you are responsible for immediately taking all reasonable steps necessary to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational.

“Immediately” requires initial action on the same day a condition is found. However, if a problem is identified at a time in the work day when it is too late to initiate corrective action (after 2 P.M.), the initiation must begin no later than the following work day.

Documentation of newly identified conditions requiring corrective action must occur within 24 hours of discovery, evidenced by entry into the CAR database.

At TA-3-38 Carpenter Shop , 1 total MSGP stormwater corrective action(s) has (have) not been completed.

At TA-3-38 Metals Fab. Shop , 1 total MSGP stormwater corrective action(s) has (have) not been completed.

At TA-60-1 Heavy Equipment Yard , 7 total MSGP stormwater corrective action(s) has (have) not been completed.

At TA-60-2 Warehouse , 4 total MSGP stormwater corrective action(s) has (have) not been completed.

Click [HERE](#) to access the list of MSGP corrective action(s) not yet completed for UI.

Click [HERE](#) to access the list of all MSGP corrective action(s) not yet completed.

The ESH Deployed Environmental Professional (DEP) assigned to your organization/area is (are) Jane Doe :John Doe.

The color legend on the linked reports corresponds to the following schedule for corrective action completion as required by the 2015 MSGP:

You must complete the corrective action within 14 calendar days of discovery.

If completion of final corrective actions within 14 days is not feasible, the reason(s) must be documented and a description of steps required and formal schedule for completion, which must be done as soon as practicable after the 14-day timeframe, but not longer than 45 days after discovery. The reasons, steps and schedule for completion must be entered into the CAR database.

If the completion of corrective action will exceed the 45-day timeframe, you must take the minimum additional time necessary, provided that you notify Region 6 of the Environmental Protection Agency:

- of your intent to exceed 45 days,
- your rationale for an extension, and
- a completion date.

To assist the preparation of this notification, as a responsible individual, you must contact the EPC-CP Project Lead at 667-1312 for any corrective action that remains open 35 days or more, and provide a formal status of the progress for each corrective action. By day 40, the DEP must provide the EPC-CP Project Lead the rationale for potentially exceeding the required 45-day timeframe and a proposed completion date for each associated corrective action. The DEP must also amend the rationale and completion date in the CAR database.

An extension request must be submitted to Region 6 of the U.S. Environmental Protection Agency by EPC-CP personnel prior to day 45 for final corrective actions not completed or estimated to be completed within 45 days of discovery.

The responsible individual must ensure compliance with the proposed completion schedule.

These intervals are not considered grace periods, but are defined schedules to ensure the conditions requiring corrective action do not persist indefinitely.

Where corrective actions result in changes to controls or any procedures documented in the facility's Storm Water Pollution Prevention Plan (SWPPP), the DEP must modify the SWPPP accordingly within 14 calendar days of completing corrective action work.

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Attachment 5 – Example Outstanding Corrective Action Report

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EPC-CP MultiSector General Permit (MSGP)
Corrective Action Report Findings
Final Corrective Actions Not Yet Complete (as of 02/01/2018)

FOD	RAD	MSGP Facility	CA#	Person Identifying Condition	Date Problem Identified	Corrective Action Initiated Date	Days to Take Action	Projected Completion Date	Projected Days until Completion	Days Open (since Discovery)	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 Findings:											2	

Legend

!	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 17: EPC-CP-QP-064 MSGP STORMWATER VISUAL ASSESSMENTS

EPC-CP-QP-064Revision: **1**

Effective Date: 10/09/2018

Next Review Date: 10/09/2021

Environment, Safety, Health Directorate**Environmental Protection and Compliance-Compliance Programs****Quality Procedure****MSGP Stormwater Visual Assessments****Document Owner:**

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Holly L. Wheeler	EPC-CP	Signature on File	9-11-18

Derivative Classifier: ☒ **Unclassified** or ☐ _____

Name:	Organization:	Signature:	Date:
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Approval Signatures:

Subject Matter Expert:	Organization:	Signature:	Date:
Holly L. Wheeler	EPC-CP	Signature on File	9-11-18
Responsible Line Manager:	Organization:	Signature:	Date:
Terrill W. Lemke	EPC-CP Team Leader	Signature on File	9-12-18
Responsible Line Manager:	Organization:	Signature:	Date:
Taunia S. Van Valkenburg	EPC-CP Group Leader	Signature on File	10-9-18

*This copy is uncontrolled.**Users are responsible for ensuring they work to the latest approved version.**To document a required read, Login to [UTrain](#), and go to the Advanced Search.*

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REVISION HISTORY

Document Number and Revision <i>[Include revision number, beginning with Revision 0]</i>	Effective Date <i>[Document Control Coordinator inserts effective date]</i>	Description of Changes <i>[List specific changes made since the previous revision]</i>
ENV-RCRA-QP-064, R0	7/09	New document <i>MSGP Storm Water Visual Inspections</i> .
ENV-RCRA -QP-064, R1	3/10	Clarifications and added attachments.
ENV-RCRA -QP-064, R2	2/12	Biennial review/revision
EPC-CP-QP-064, R0	10/04/2017	This document replaces ENV-RCRA-QP-064 R2. Converted into new format, and new organization name, clarified steps, updated attachments.
EPC-CP-QP-064, R1	10/09/2018	Removed requirement to conduct visual assessment on filtered samples. Updated form to match text.

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1.0 INTRODUCTION

Los Alamos National Laboratory (LANL) through Environmental Protection and Compliance-Compliance Programs (EPC-CP) conducts stormwater monitoring activities required pursuant to the National Pollutant Discharge Elimination System (NPDES), Multi-Sector General Permit (MSGP). The MSGP requires LANL to monitor stormwater runoff from industrial sites relative to potential pollutants.

1.1 Purpose

This procedure describes the process for conducting visual assessments of stormwater from outfall locations where LANL conducts stormwater monitoring activities under the MSGP.

1.2 Scope

Requirements set forth in this document apply to LANL industrial facilities covered by the MSGP. These facilities include, a warehouse, several metal fabrication areas/shops, a heavy equipment yard, an asphalt batch plant, roads and grounds, a foundry, a power plant, a material recycling facility and a carpenter shop. Inspection waivers may be granted by EPC-CP for adverse weather conditions and unstaffed or inactive sites.

At least once each MSGP monitoring quarter an unfiltered stormwater sample must be collected from each discharge point covered by the MSGP and site specific Storm Water Pollution Prevention Plan (SWPPP) and visually inspected for water quality characteristics. Stormwater samples are collected with an automated sampler, single stage sampler, or by taking a grab sample.

Assessments conducted under this procedure are documented using the Maintenance Connection Express™ (MC Express) web application on a tablet or notebook style computer. In the event of electronic hardware or web application failure, personnel may use a printed hard copy to document the work.

1.3 Applicability

This procedure applies to the EPC-CP technical staff and subcontractor personnel (as applicable) who conduct stormwater visual assessments during or after measurable storm events at MSGP outfalls.

Note: A measurable storm event is identified in section 6.1.3 of the MSGP as one “that results in an actual discharge from your site that follows the preceding measurable storm event by at least 72 hours (three days).”

2.0 PRECAUTIONS AND LIMITATIONS

Hazards in the work described in this procedure are controlled through site specific Integrated Work Documents (IWDs). The hazard level for the activities described in this procedure is **low**. The IWD Part II (2101 Form) will address site-specific requirements and training for Facility Operations Divisions (FODs).

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Work may be discontinued during periods or conditions that make sites dangerous for worker safety or prevent personnel from safely accessing sites (e.g., weather-related events such as flash floods, flooding, lightning, wildfires, hail, icy roads, deep snow, or LANL operations such as firing shots or burns).

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

- The “Reading” field in MC Express is the same field as “Reading Final” in Maintenance Connection desktop and “Meas.” on a hard copy (printed) work order.
- The “Complete” option in MC Express is the same as a “Yes” answer; the “Failed” option in MC Express is the same as a “No” answer. Maintenance Connection desktop and hard copy (printed) work orders use “Yes” and “No” terminology.

3.0 PREREQUISITE ACTIONS

3.1 Planning and Coordination

1. Schedule work to be completed by the target date appearing on the work order(s) or as requested by the MSGP Program Lead if a form is not issued.
2. Obtain necessary additional paperwork (if required) before conducting this work, including IWD’s, and excavation permits.
3. As specified in the IWD, inform (e.g., by e-mail) facility contacts and/or DEP (Deployed Environmental Professional) of the schedule for work and locations up to a week (preferred) before but no later than the day before (for minor changes) so work is added to the appropriate plan of the day.

Note: For some FODs (e.g., Utilities and Institutional Facilities), MSGP stormwater monitoring activities are on a standing plan of the day. However, this must be requested each year at the beginning of the monitoring season.

4. The IWD Part II (2101 Form) addresses specific requirements and training for FODs.
5. Gather the required equipment (see Section 3.2) for the work to be done.
6. Using the Safari or Chrome web browser on a tablet or notebook style computer, navigate to <http://express.maintenanceconnection.com> and select English from the available dropdown menu.
7. Log into the MC Express application using your login credentials. Confirm that the work order list displayed in the “My Open Work Orders” section matches your sites. If work orders are not displayed, click the “Refresh” bar at the bottom of the page. The page will refresh and any work orders issued since you logged in will be loaded to the application. If the work order lists still do not match, contact the MSGP Data Management Team for clarification.

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8. Ensure that field personnel have access to accurate time measurement at the Site. When at the site, the clock time on the ISCO sampler must be set to Mountain Standard Time at all times, with no daylight saving time adjustment.

3.2 Tools and Equipment

Ensure the following equipment is available in the field vehicle:

- Safety glasses with side shields
- Nitrile gloves
- Sturdy hiking boots or steel toed shoes with soles that grip and other facility specific Personal Protective Equipment
- Cell phone (only government cell phones are allowed in secure areas) (See <https://int.lanl.gov/policy/documents/P217.pdf> for requirements for using portable electronic devices on Laboratory property.)
- Current copy of this procedure
- Current copy of the IWD(s)
- Current copy of the MSGP Sampling and Analysis Plan
- Site Map(s) (as needed)
- Current electronic work order or paper inspection form
- Government issued electronic tablet with Safari web browser and Blackberry UEM™ app. (See <https://int.lanl.gov/policy/documents/P217.pdf> for requirements for using portable electronic devices on Laboratory property.)
- Necessary access and station keys
- Certified clean replacement sample bottles (clear glass or clear poly)
- Paper Towels

4.0 VISUAL ASSESSMENT OF STORMWATER

1. Take the sample bottle with water out of automated sampler or single stage jar off the ground, or fill a clear sample bottle with a grab sample and wipe off exterior.
Note: If a grab sample is collected, it will be collected during daylight hours in a wide mouth clear glass or plastic container within 30 minutes of discharge from a storm event.
2. In MC Express, click on the appropriate work order number to open the work order. The work order will open in the display to the work order Summary page.
3. Click on the “Tasks” bar to navigate to the work order Tasks page. See MC Express screen shot examples in Attachment 1 and a hard copy example in Attachment 2.

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4. Any additional comments not documented in the “Reading” field will be entered in the “Comments” field of the same task line. If the inspector needs more space, additional comments will be entered in the “Labor Report Update” field (see Section 4.3) when the work order is updated to “Complete” status.
5. Click the “Save” bar after all entries for a task line have been completed and before proceeding to the next question. Failure to “Save” results in lost data entries.

4.1 Documenting Sample Information

Each item number listed in red font below corresponds to a red numbered box on both screenshots (Attachment 1) and hard copy format (Attachment 2).

1. **Item 1:** Document the monitoring period by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe the monitoring period (e.g., Apr-May, Jun-Jul, Aug-Sep, and Oct-Nov).

Note: If the discharge collected is from a rain event from the previous monitoring period but the visual assessment is made in the following monitoring period, document monitoring period on the inspection to correspond to the period in which the rain event took place.

2. **Item 2:** Check the date and time stormwater discharge began and document by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”.

Enter the date and time in the following date formats: MM/DD/YY, or MM-DD-YY. Time must be entered in 24-hr format.

Note: If the discharge date/time is not available (e.g., precipitation report) when the visual is performed in the field, leave this Task Line incomplete and complete when the information is available.

3. **Item 3:** Check the date and time the sample was collected and document by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”.

Enter the date and time in the following date formats: MM/DD/YY, or MM-DD-YY. Time must be entered in 24-hr format.

Note: If the collection date/time is not available (e.g., precipitation report) when the visual is performed in the field, leave this Task Line incomplete and complete when the information is available.

4. **Item 4:** Check the date and time stormwater was visually assessed and document by clicking on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”.

Enter the date and time in the following date formats: MM/DD/YY, or MM-DD-YY. Time must be entered in 24-hr. format.

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5. **Item 5:** Observe the nature of the discharge and document by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe the discharge (e.g., rainfall or snowmelt) and the TOTAL amount of precipitation from the event.

Note: If the total amount of precipitation is not available (e.g., precipitation report) when the visual is performed in the field, leave this Task Line incomplete and complete when the information is available.

6. **Item 6:** Check the sample was collected in the first 30 minutes of discharge and document by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes. The field inspector will document the reason a sample could not be collected within the first 30 minutes.

4.2 Assessing Parameters

While conducting the visual examinations, personnel will constantly be attempting to relate any pollutant that is observed in the sample to a pollutant source on the site.

If there are any potential sources of pollutants on site, document the following, and contact the EPC-CP MSGP Project Lead within 24 hrs. of identification.

- Potential sources;
 - Indicate if there are any Best Management Practices (BMPs) on site and evaluate and note effectiveness; and
 - If no BMPs, determine if installation could correct future pollutant migration.
7. **Item 7:** Observe the color of the discharge in the sample container and document by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe the color.
 8. **Item 8:** Observe any odors detected from sample and document by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe the odor (e.g., musty, sewage, sulfur, sour, solvents, petroleum/gas, etc.).
 9. **Item 9:** Observe the clarity of the discharge and document by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe the clarity (e.g., slightly cloudy, cloudy, opaque).

Clarity is described as the depth in which you can look into or through water. For example, an individual can see through a clear glass of clean water in daylight. Generally, the clarity of the water is a good visual indicator of the purity of water. If the water is poor in clarity there is most likely suspended solids throughout the water.

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10. **Item 10:** Observe any floating solids and document by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Careful examination will determine whether the solids are raw materials (e.g., product used to fabricate something, or ingredients used in a formulation) or waste materials (e.g., shavings, woodchips and sawdust, trash). Describe any floating solids observed.
11. **Item 11:** Observe any settled solids in the sample and document by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe any settled solids observed (e.g., fine, course).

Settled solids may be an indicator of unstable ground cover combined with a high intensity stormwater runoff event.

12. **Item 12:** Observe any suspended solids in the sample and document by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe any suspended solids observed (e.g., fine, course).

Most often suspended solids include fine sediment. This may be an indication of an unstable channel with eroding banks. Some water appears to be colored because of relatively coarse particulate material in suspension such as sediment.


13. **Item 13:** Check the sample is free of foam and document by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Gently shake the sample container. Describe any bubbles in or on the surface of the water and the color of the foam.

If it is determined that foam is caused by a pollutant, complete the visual assessment and contact the EPC-CP MSGP Project Leader **immediately following completion of the assessment**. Follow-up action is required within 24 hours.

14. **Item 14:** Check the sample is devoid of any oil sheen and document by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. If an oil sheen is present, describe the thickness and consistency (e.g., flecks, globs).


If an oil sheen is present, contact the EPC-CP MSGP Project Leader **immediately following completion of the visual assessment**. Determine the nature of the discharge (rain, snow, hail), the source of the oil sheen and if existing BMPs are effective in mitigation of potential pollutants or if a new BMP needs to be installed. Follow-up action is required within 24 hours.

15. **Item 15:** Check the discharge is free of any other indicators of stormwater pollution not described in any other task line above and document by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe any observations.

16. When all task lines have been completed, click the “Back” button  in the upper left hand corner to exit the work order Tasks page and return to the work order Summary page.

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4.3 Completing the Assessment Form

1. Ensure the inspection form has been filled out completely including information not available during the field inspection (e.g., date/time of discharge, date/time of sample collection, total precipitation amount).
2. Click the checkered flag  in the upper right corner of the work order Summary page. The work order will open in the display to the Status Update page.

MC Express automatically changes the work order status to “Closed” and auto populates the date/time fields.

3. **Item 16:** Click on the expand arrow located on the right side of the “New Status” field and select “Completed” from the available dropdown menu. Ensure the date and time auto-populated are the date and time the **work was completed** and **not the date/time the form was filled out**. If work needs to be performed over multiple days, enter the date and time the work began in the Labor Report field. To update the date or time, click the “Date” field and make necessary adjustments using the available timestamp application. Click “Set” to apply changes.
4. **Item 17:** The inspector enters/prints his/her name in the “Labor Report Update” field.
Any additional notes, observations, or site conditions not documented in a task line “Reading” or “Comments” field will be documented in the “Labor Report Update” field.
5. Scroll down the page to the “Signature” bar and click the expand arrow on the left side of the bar to open the “Signature” field.
6. **Item 18:** Capture an electronic signature by drawing with a finger on the tablet screen. The Lead Inspector is certifying that the information submitted is “true, accurate, and complete” by electronically signing the work order.

Note: If using MC Express on a desktop screen (not a tablet), the mouse must be used to sign electronically.


7. Click on the “Save” bar at the bottom of the page to close the “Signature” field.
8. Click on the “Back” button in the upper left hand corner to return to the “My Open Work Orders” page.
9. Once you have completed an inspection, click on the Menu button again, and then click the “Logout” bar. Close the browser. All work will automatically upload from the MC Express application to the MC database.

Always log out of MC Express when you have finished work OR if work is interrupted.

4.4 Completing the Certification Statement

1. Using the Safari web browser on a desktop computer, navigate to <http://www.maintenanceconnection.com>. Log into the MainConn desktop application using your login credentials.

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2. Click “Open” in the tool bar at the top of the page to open the MainConn module selections. Click on the “Work Orders” module. See Attachment 3 for screenshot examples of printing from MainConn.
3. Click on the “Search” tab at the top left of the page and enter the work order number in the “Search Value” field. Click the arrow to the right of the “Search Value” field to open the work order in the right split screen.
4. Click on the “Report” tab at the top of the page and click the “Work Order Statement” sub-tab.
5. Click the Tools drop down menu  in the top right corner of the page and select “Print” from the options. The print dialog box will open. Select the print options as appropriate for your local printer.
6. **Item 19:** Obtain a printed name and title, signature, and date on the certification statement (see Attachment 2). The visual assessment form must be certified with a signature from a manager that meets the definition of a signatory in MSGP Permit Section B.11.A (e.g., FOD, Operations Manager; Deployed Environmental, Safety, and Health Group Leader; EPC Group Leader, EPC-CP Team Leader). The manager is certifying the information submitted is “true, accurate, and complete” by signing the form.

EPC-CP will send out completed visual assessment forms at the end of each quarter that will contain a certification statement in the cover memorandum. The duly authorized signatory may sign and date this certification statement rather than the certification line associated with each attached form. However, the memorandum and associated completed forms must remain together.

7. Place the completed and signed visual assessment into the facility SWPPP.

5.0 EVIDENCE OF STORMWATER POLLUTION

If stormwater contamination is identified through visual assessment personnel will attempt to identify the pollutant source. Personnel will evaluate whether or not BMPs have already been implemented and evaluate whether or not these are working correctly or need maintenance. A design change could also be incorporated into the stormwater pollution prevention plan to eliminate or minimize the contaminant source from occurring in the future. Personnel will evaluate whether or not implementation of additional BMPs are needed in the pollution prevention plan to address the observed contaminant.

A cleanup of the site should be conducted if the pollutant source is known and well defined. The FOD, DEP, and MSGP representative of EPC-CP should also be contacted and made aware of the situation.

Refer to EPC-CP-QP-022, *MSGP Corrective Actions*.

6.0 TRAINING

The following personnel require training before implementing this procedure:

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- EPC-CP technical staff and subcontract or other personnel who retrieve stormwater samples and conduct visual assessments at automated samplers, single stage stormwater samplers, or by grab sample for the MSGP.

For EPC-CP staff, the training method for this procedure is “self-study” (reading). Other participating groups may require training documentation pursuant to local procedures.

Personnel performing this procedure will be familiar with the most current versions of the following procedures and operation manuals:

- EPC-CP MSGP Sampling and Analysis Plan for the current monitoring year

7.0 RECORDS

Records generated by this document and signed by the EPC-CP certifier will be submitted to the EPC-CP Records Management designated point of contact or document manager in accordance with P1020-1, *Laboratory Records Management* and with ADESH-AP-006, *Records Management Plan*.

- EPC-CP-Form-1021, *MSGP Quarterly Visual Assessment*

8.0 DEFINITIONS AND ACRONYMS

See LANL *Definition of Terms*.

8.1 Definitions

Adverse weather conditions – Weather that prohibits collection of samples such as local flooding, high winds, hurricanes, tornadoes, electrical storms, etc. Could also include drought, extended frozen conditions, etc.

Best Management Practices (BMPs) – Schedules of activities, practices, prohibitions of practices, structures, vegetation, maintenance procedures, and other management practices to prevent or reduce pollution. BMPs also include treatment requirements, operating procedures, and practices to control facility site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

Clarity – Clearness or cleanness of appearance. This includes the visual observation of suspended sediment.

Color – Unpolluted water will be clear and colorless. Color must not be confused with clarity.

Floating solids – Particulate material floating on the surface of the water. Examples include raw or waste materials and common trash.

Foam – An accumulation of fine frothy bubbles formed in or on the surface of water. A mass of bubbles of air in a matrix of liquid film.

Measurable storm event – Precipitation that results in an actual discharge from your site that follows the preceding measurable storm event by at least 72 hours (3 days).

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Odor – The property or quality of waters that affects or stimulates the sense of smell. Examples of odors that may be present are burnt oil, petroleum hydrocarbon, sewage, diesel, sulfuric, or detergent odors.

Oil sheen – The presence of rainbow-like colors glistening on the surface of a liquid. The color of oil sheen will vary dependent on thickness and consistency.

Settled solids – Settled particulate material i.e., heavier than water. Examples include sand, gravel, metal turnings, and glass.

Suspended solids – Particulate materials that are floating between the bottom of the sample and the surface of the water.

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

8.2 Acronyms

See LANL *Acronym Master List*.

BMP	Best Management Practice
DEP	Deployed Environmental Professional
EPC-CP	Environmental Protection and Compliance – Compliance Programs
FOD	Facility Operations Division
IWD	Integrated Work Document
LANL	Los Alamos National Laboratory
MC Express	Maintenance Connection MC Express web application
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SWPPP	Storm Water Pollution Prevention Plan

9.0 REFERENCES

Federal Register: *Final National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Industrial Activities*. Federal Register: September 29, 2008, Volume 73, Number 189

P1020-1, Laboratory Records Management

ADESH-AP-006, Records Management Plan

EPC-CP-QP-022, MSGP Corrective Actions

10.0 ATTACHMENTS

Attachment 1: *Screenshot Examples of EPC-CP-Form-1021 in MC Express*

Attachment 2: *EPC-CP-Form-1021 Hard Copy Example*

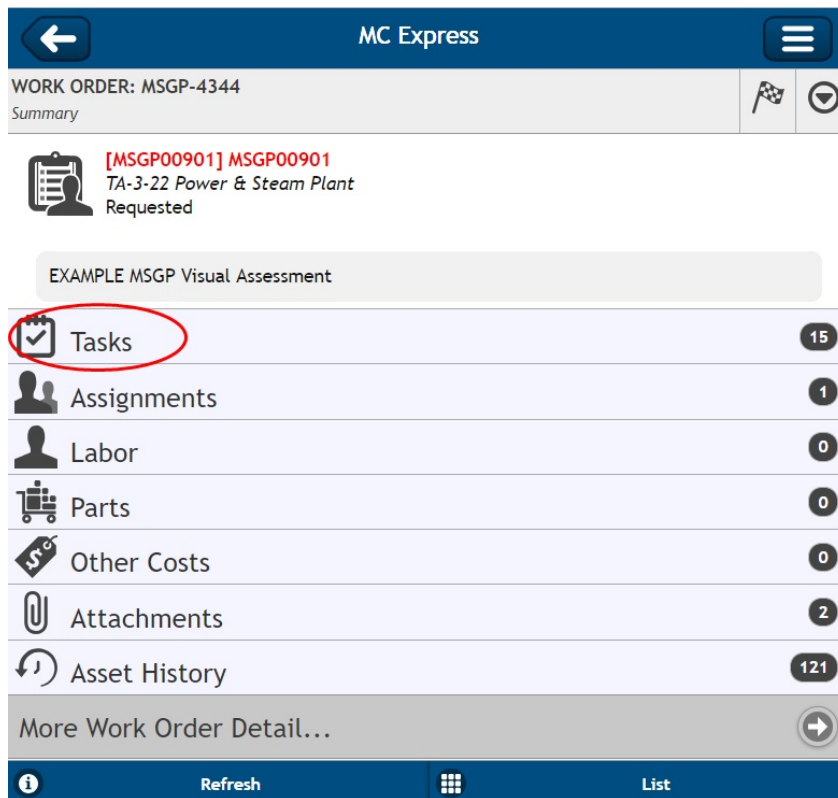
Attachment 3: *Screenshot Examples of Printing from Maintenance Connection*

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Attachment 1 – Screenshot Examples of EPC-CP-Form-1021 in MC Express

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Work Order Summary Page (section 4.0, step 2)



The screenshot displays the 'MC Express' interface for a work order summary. At the top, the header bar shows a back arrow, the text 'MC Express', and a menu icon. Below the header, the work order number 'WORK ORDER: MSGP-4344' is displayed, along with a 'Summary' tab and two icons (a flag and a dropdown arrow). The main content area features a list of items related to the work order. The first item is 'Tasks', which is circled in red and has a count of 15. Other items include 'Assignments' (1), 'Labor' (0), 'Parts' (0), 'Other Costs' (0), 'Attachments' (2), and 'Asset History' (121). A 'More Work Order Detail...' link is at the bottom of the list. The bottom navigation bar contains an information icon, a 'Refresh' button, a grid icon, and a 'List' button.

Item	Count
Tasks	15
Assignments	1
Labor	0
Parts	0
Other Costs	0
Attachments	2
Asset History	121

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Attachment 1 – Screenshot Examples of EPC-CP-Form-1021 in MC Express

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Work Order Tasks Page – Documenting Sample Information (Section 4.0, Step 3)

MC Express

WORK ORDER: MSGP-4344

Tasks

The result of this VA applies to associated SIOs as defined in the SWPPP, where applicable.

Sample information

30 Document the monitoring Period (e.g., Apr-May)

40 Document the Date/Time Discharge began in the "Reading" field of this line (using mm/dd/yy hh:mm format).

50 Document the Date/time sample collected in the "Reading" field of this line (using mm/dd/yy hh:mm format).

60 Document the Date/time sample visually assessed in the "Reading" field of this line (using mm/dd/yy hh:mm format).

70 Document the nature of discharge (e.g., rain, snowmelt). Document the TOTAL amount (in) in the "Reading" field of this line.

80 Sample collected in first 30 minutes of discharge? If "Failed" or unknown, provide a reason.

Refresh List

MC Express

WORK ORDER: MSGP-1423

Edit Task

30 Document the monitoring Period (e.g., Apr-May)

Reading

Jun-July

Initials

Failed?

No

Not Applicable?

No

Complete?

Yes

Comments

Cancel Save

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Attachment 1 – Screenshot Examples of EPC-CP-Form-1021 in MC Express (cont.)

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Work Order Tasks Page – Assessing Parameters (section 4.2, step 7)

MC Express

WORK ORDER: MSGP-4344

Tasks

Parameters

110

Is sample colorless? If "Failed", describe.

7

↓

120

Is sample odorless? If "Failed", provide description (e.g. musty, sewage, sulfur, sour, solvent, petroleum/gas)

8

↓

130

Is sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque).

9

↓

140

Is sample free of floating solids? If "Failed", describe if raw or waste material(s) in the comments of this line.

10

↓

150

Is sample free of settled solids? If "Failed", provide description (e.g., fine, coarse).

11

↓

160

Is sample free of suspended solids? If "Failed", provide description (e.g., fine, coarse).

12

↓

170

Is sample foamless after gently shaking? If "Failed" describe foam color and location (e.g., 'on the surface' or 'in the sample').

13

↓

180

Is sample devoid of an oil sheen? If "Failed", describe color and thickness (e.g. flecks, globs).

14

↓

190

Is sample free of other obvious indicators of pollution? If "Failed", describe.

15

↓

Refresh

List

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Attachment 1 – Screenshot Examples of EPC-CP-Form-1021 in MC Express (cont.)

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Work Order Status Update Page (section 4.3, steps 3 and 4)

MC Express

WORK ORDER: MSGP-4344
Status Update

Issued / Completed

New Status **16**

Completed

Date

6/19/2018 10:48 AM

Percent Complete 100%

Labor Report Update **17**

Select Comments to Add.....

Jane Admin

Cancel Save

Work Order Status Update Page (section 4.3, step 6)

MC Express

WORK ORDER: MSGP-4344
Status Update

Signature **18**

(Remove)

Jane Admin

Cancel Save

Attachment 2 – EPC-CP-Form-1021 Hard Copy Example

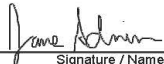
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Los Alamos National Lab - ADESH

Work Order MSGP-4344

MSGP Monitoring Stations
Printed 6/19/2018 - 10:55 AM (Duplicate Copy)**Maintenance Details****Requested By:** Admin, Jane on 6/7/2018
10:51:00 AM**Target:** 12/31/2018**Procedure:** MSGP Quarterly Visual
Assessment (EPC-CP-
Form-1021.2)**Priority/Type:** / Inspection**Department:** Utilities and Infrastructure**Last PM:** 5/5/2010 MSGP Program RG121.9 TA-3-22 Power & Steam Plant Monitored Outfall (009) MSGP00901**Reason:** EXAMPLE MSGP Visual Assessment**Contact:** Admin, Jane**Phone:** 123-4567**Special Instructions:** NMR053195**Tasks**

#	Description	Meas.	No	N/A	Yes
The result of this VA applies to associated SIOs as defined in the SWPPP, where applicable.					
Sample information					
1 30	Document the monitoring Period (e.g., Apr-May)		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2 40	Document the Date/Time Discharge began in the "Reading" field of this line (using mm/dd/yy hh:mm format).		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3 50	Document the Date/time sample collected in the "Reading" field of this line (using mm/dd/yy hh:mm format).		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4 60	Document the Date/time sample visually assessed in the "Reading" field of this line (using mm/dd/yy hh:mm format).		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5 70	Document the nature of discharge (e.g., rain, snowmelt). Document the TOTAL amount (in) in the "Reading" field of this line.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6 80	Sample collected in first 30 minutes of discharge? If "Failed" or unknown, provide a reason.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parameters					
7 110	Is sample colorless? If "Failed", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8 120	Is sample odorless? If "Failed", provide description (e.g. musty, sewage, sulfur, sour, solvent, petroleum/gas)		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9 130	Is sample clear? If "Failed", provide description (e.g., slightly cloudy, cloudy, opaque).		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10 140	Is sample free of floating solids? If "Failed", describe if raw or waste material(s) in the comments of this line.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11 150	Is sample free of settled solids? If "Failed", provide description (e.g., fine, coarse).		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12 160	Is sample free of suspended solids? If "Failed", provide description (e.g., fine, coarse).		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13 170	Is sample foamless after gently shaking? If "Failed" describe foam color and location (e.g., 'on the surface' or 'in the sample').		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14 180	Is sample devoid of an oil sheen? If "Failed", describe color and thickness (e.g. flecks, globs).		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15 190	Is sample free of other obvious indicators of pollution? If "Failed", describe.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Labor Report16 **Completed:** 6/19/2018 10:48:00 AM17 **Report:** Jane Admin18 
Signature / Name6/19/2018
Date

Signature / Name

Date

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

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Attachment 2 – EPC-CP-Form-1021 Hard Copy Example (cont.)

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CERTIFICATION STATEMENT

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

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

19 Print name and title: _____

Signature: _____ Date: _____

EPC-CP-Form-1021.2 09/2018

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Attachment 3 – Screenshot Examples of Printing from Maintenance Connection

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Maintenance Connection Modules Page (Section 4.4)

The first screenshot shows the 'Work Orders' module in the 'Home - Summary' page. The 'Work Orders' link is circled in red. A dotted arrow points from this link to the second screenshot.

The second screenshot shows the 'Work Orders' search interface. The 'Search' button is circled in red. A dotted arrow points from this button to the third screenshot.

The third screenshot shows the 'Work Order: MSGP-58534' details page. The 'Report' button is circled in red. A dotted arrow points from this button to the fourth screenshot.

The fourth screenshot shows the 'Work Order: MSGP-58534' details page. The 'Print' button is circled in red. A dotted arrow points from this button to the final printout.

The final printout shows the 'Work Order: MSGP-58534' details page. The 'Print' button is circled in red. A dotted arrow points from this button to the final printout.

The final printout shows the 'Work Order: MSGP-58534' details page. The 'Print' button is circled in red. A dotted arrow points from this button to the final printout.

**ATTACHMENT 18: EPC-CP-QP-047 INSPECTING STORMWATER RUNOFF SAMPLERS AND RETRIEVING
SAMPLES FOR THE MSGP**

EPC-CP-QP-047

Revision: 2



Effective Date: 09/06/2017

Next Review Date: 09/06/2020

Environment, Safety, and Health Directorate**Environmental Protection and Compliance Division – Compliance Programs****Quality Procedure****Inspecting Stormwater Runoff Samplers and
Retrieving Samples for the MSGP****Document Owner/Subject Matter Expert:**

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REVISION HISTORY

Document Number and Revision <i>[Include revision number, beginning with Revision 0]</i>	Effective Date <i>[Document Control Coordinator inserts effective date]</i>	Description of Changes <i>[List specific changes made since the previous revision]</i>
ENV-RCRA-QP-047, Rev. 0	03/11	New Document.
ENV-RCRA-QP-047, Rev. 1	02/13	Annual Review and Revision
EPC-CP-QP-047, Rev. 2	09/06//2017	Review and revision. Updated document to new template and new group name. Clarified steps, modified inspection form EPC-CP-Form-1010, and added crosswalk to electronic form in MC Express. This document replaces ENV-RCRA-QP-047 R1.

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1.0 INTRODUCTION

Los Alamos National Security, LLC (LANS) through Environmental Protection and Compliance-Compliance Programs (EPC-CP) conducts stormwater monitoring activities required pursuant to the National Pollutant Discharge Elimination System (NPDES), Multi-Sector General Permit (MSGP) at Los Alamos National Laboratory (LANL). The MSGP requires LANL to monitor stormwater runoff from industrial sites relative to potential pollutants.

1.1 Purpose

This procedure describes the process for inspecting ISCO stormwater samplers and retrieving stormwater runoff samples from monitored outfall locations where LANS conducts stormwater monitoring activities pursuant to the NPDES, MSGP at LANL.

Inspections and sample retrieval conducted under this procedure should be documented using the Maintenance Connection Express™ (MC Express) web application on a tablet or notebook style computer. (In the event of electronic hardware or web application failure, personnel may use a printed hard copy to conduct inspection and sample retrieval.)

1.2 Scope

This procedure applies to the EPC-CP technical staff and subcontractor personnel (as applicable) conducting activities at automated stormwater sampling stations used for monitoring industrial stormwater discharge under the MSGP.

The MSGP Program Lead is the primary person with responsibility for the steps in this procedure. EPC-CP personnel will be appointed with responsibility for a subset of sampling stations.

1.3 Applicability

Stormwater runoff samples are collected at MSGP Program stations either with a refrigerated Avalanche® or ISCO 3700 automated sampler, single stage sampler or grab sample. ISCOs are designed to automatically collect water when the water surface is high enough to trigger a liquid level actuator and fill the sample bottles. Field personnel are required to inspect the sampling station while retrieving water samples during MSGP stormwater monitoring periods and at other intervals determined by the program or as directed by program personnel.

2.0 PRECAUTIONS AND LIMITATIONS

Hazards in the work described in this procedure are controlled thorough site specific Integrated Work Documents (IWDs). The hazard level of the activities in this procedure is **moderate**.

Personnel performing steps in this procedure that involve electrical equipment **MUST** be trained to LANL electrical safety standards as prescribed in the IWD before performing those steps.

Inspections may be discontinued during periods or conditions that make sites dangerous for worker safety or prevent personnel from safely accessing sites (e.g., weather-related events such as flash

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floods, flooding, lightning, wildfires, hail, icy roads, deep snow, or LANL operations such as firing shots or burns).

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

- The “Reading” field in MC Express is the same field as “Reading Final” in Maintenance Connection desktop and “Meas.” on a hard copy (printed) work order.
- The “Complete” option in MC Express is the same as a “Yes” answer; the “Failed” option in MC Express is the same as a “No” answer. Maintenance Connection desktop and hard copy (printed) work orders use “Yes” and “No” terminology.

3.0 PREREQUISITE ACTIONS

3.1 Planning and Coordination

1. Schedule work to be completed by the target date appearing on the work order(s) or as requested by the MSGP Program Lead if a form is not issued.
2. Inform (e.g., by e-mail) Facility contacts, as specified in the IWD, of the schedule for sampler inspection work and locations up to a week (preferred) before but no later than the day before (for minor changes) to be added to the appropriate plan of the day.

Note: For some Facility Operations Divisions (FODs) like the Utilities and Institutional Facilities FOD, MSGP stormwater monitoring activities are on a standing plan of the day. However, this must be requested each year at the beginning of the monitoring season.

3. The IWD Part II (2101 Form) addresses specific requirements and training for FODs.
4. Obtain any necessary additional paperwork before conducting this work, including IWD’s, and excavation permits (as necessary).
5. Gather the required equipment (see section below) for the work to be done.
6. Using the Safari web browser on a tablet or notebook style computer, navigate to <http://express.maintenanceconnection.com> and select English from the available dropdown menu.
7. Log into the MC Express application using your login credentials.
8. Confirm that the work order list displayed in the “My Open Work Orders” section matches your sites (see example in Attachment 1). If work orders are not displayed, click the “Refresh” bar at the bottom of the page. The page will refresh and any work orders issued since you logged in will be loaded to the application. If the work order lists still do not match, contact the MSGP Data Management Team for clarification.
9. Ensure that field personnel have access to accurate time measurement at the Site. When at the site, the clock time on the ISCO sampler must be set to Mountain Standard Time at all times, with no daylight saving time adjustment.

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3.2 Tools and Equipment

Ensure the following equipment is available in the field vehicle:

- Safety glasses with side shields
- Sturdy hiking boots or steel toed shoes with soles that grip
- Nitrile gloves
- Cell phone (only government cell phones with batteries removed are allowed in secure areas)
- Copy of this procedure
- Copy of the Integrated Work Documents (IWDs)
- Copy of the MSGP Sampling and Analysis Plan
- Site Map(s) (as needed)
- Current electronic or paper inspection form EPC-CP-Form-1010, MSGP ISCO Sampler Inspection and Sample Retrieval
- Sample Collection Log/Field Chain of Custody (see EPC-CP-QP-048)
- Government issued iPad equipment with Safari web browser and Good™ app.
- Necessary access and station keys
- Charged spare battery(s)
- Battery voltage tester
- Clean spare tubing (pump, suction, discharge types, sampler specific)
- Certified clean replacement sample bottles (glass and poly)
- Spare/replacement sampler parts (liquid level actuator, distributor arm)
- Shovel
- Wooden stakes
- Plastic wire “zip” ties
- Coolers with ice or Blue Ice®
- Paper Towels
- Marker pen (permanent, waterproof)
- Ball point pen
- Zip lock bags
- Chain of custody seals

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- 0.45 micron filter (where applicable)

4.0 INSPECTING STORMWATER SAMPLERS AND RETRIEVING SAMPLES

Throughout this procedure the field inspector should document comments and notations in the “Reading” field of the associated task line. Any additional comments not documented in a “Reading” field can be entered in the “Comments” field of the same task line. If the inspector needs more space additional comments can be entered in the “Labor Report Update” field (see Section 4.3) when the work order is updated to “Complete” status.

4.1 Inspecting the Sampler

1. If conditions prevent a sampler inspection, document the conditions in the “Labor Report Update” field on the work order and notify the Program Lead or designee within 24 hours. Multiple attempts can be documented on the original inspection work order. If the target date cannot be met, the inspector must contact the MSGP Program Lead no less than 24 hours before target date for guidance.
2. In MC Express open the work order issued for the current location by clicking on the appropriate line. If needed, use the expand arrow located on the right side of the display to expand the work order detail information. The work order will open in the display to the work order Summary page.
3. Click on the “Tasks” bar to navigate to the work order Tasks page.
4. Remove the top cover from the sampler.

4.1.1 On Arrival

5. **Item 1:** Verify and document the sampler is ON and its condition upon arrival by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes” (see example in Attachment 1). Explain any non-functional status (remember to use the “Reading” field unless more space is needed for comments). A hard copy inspection example is provided in Attachment 2 as a crosswalk to the electronic format.

If a sampler has been inactivated (e.g., sample collection completed) prior to this inspection but continues to appear on the inspection form, change the “N/A” line to “Yes”. Subsequent questions regarding this sampler may be left unanswered in this section.

CAUTION

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

6. **Item 2:** Verify and document the ISCO programming displays the following by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”.

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ISCO 3700 sampler display should indicate “Sampler Inhibited”

OR

Avalanche sampler display should indicate “Program Disabled”

If the display does not indicate these messages, describe the messages (e.g., “Done X samples”, “sampler off”, etc.). If there is no indication of flow and the sampler triggered due to a non-flow event (e.g., animal, tumbleweed, etc.), describe this. Document any messages from the ISCO display.

7. **Item 3:** Verify and document the sampler is set to the correct Mountain Standard Time +/- no more than 1 minute by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. If the sampler is set incorrectly, reprogram for the correct Mountain Standard Time. Describe the work performed and correction applied (e.g., “ISCO clock was X minutes slow”).
8. If the location has more than one sampler complete Steps 5 through 7 for each sampler.
9. Don nitrile gloves and safety glasses.
10. Remove the center section from the sampler.

4.1.2 Water Collection Information

11. **Item 4:** Document any evidence of storm water flow at the sampling location by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Describe the evidence of flow (e.g. sediment or vegetation movement, erosion, standing water).
 - If the sampler did not trip but there is evidence of flow, document the date and time storm water discharge began from the precipitation report.
 - If the sampler tripped or collected storm water, document the date/time stamp from the sampler if available or from the precipitation report.
12. **Item 5:** Document if any storm water was collected (from either a sampler or by grab sample) by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. If any water was collected, complete the Bottle Information section (**Item 20**). Document if the water is taken by grab sample. Follow the steps in Section 4.2 of this procedure to retrieve samples.
13. **Item 6:** For Avalanche samplers only, verify and document the current refrigerator temperature of the sampler if water was collected by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Record the temperature. If unable to review temperature, check “No” and describe the condition (e.g. dead battery, electrical short).

If no water was collected the field inspector may change the “N/A” line to “Yes”.

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14. **Item 7:** For Avalanche samplers equipped with an ISCO pH and Temp Module, verify and document a pH measurement was taken on the collected water by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Record the pH measurement taken at the time of Bottle 1 as “Average: Minimum:Maximum.” If unable to review pH, check “No” and describe the condition (e.g. damaged meter).

If no water was collected the field inspector may change the “N/A” line to “Yes”.

4.1.3 Water Retrieval Information

15. **Item 8:** Verify and document whether a sample volume was retrieved (from either a sampler or by grab sample) and taken off site by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. If sample volume was retrieved, record the total volume **taken off site**.
16. **Item 9:** Verify and document whether a visual assessment of the water was performed by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. The MSGP program visual assessment form is not included in this procedure (see EPC-CP-QP-064). Ensure this form is submitted with the sampler inspection form. If the sample was filtered, conduct the visual assessment and document “Filtered sample.”

4.1.4 On Departure

17. **Item 10:** Verify all cable and electrical connections are attached and firmly tightened (not loose) upon departure from the site by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”.

Connections may work loose over time due to temperature changes and if there are dissimilar metals at the connection points. The loose connections can introduce voltage spikes which inherently cause current spikes that may result in blown fuses.

If the cables require replacement, connections require tightening, or other maintenance performed, describe the work performed (e.g., “tightened connectors on battery”).

If maintenance cannot be completed at the time of inspection, then describe the condition (e.g. cables chewed through by animal) and follow-up work needed (e.g., replace cables).

18. **Item 11:** Verify and document power supply function. Use a voltage meter to check the voltage of the battery(s) and record the voltage(s). Change the “Complete” or “Failed” line to “Yes” to indicate if battery voltage is acceptable upon departure from the station (≥ 11.7 for non-floating charged batteries at ISCO 3700 samplers and ≥ 11.0 for floating-charged batteries at Avalanche samplers).

Check the voltage of the solar panel if access can be gained to the weather protected terminal covers on the back of the panel.

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4.1.5 Equipment Specific Tasks

19. **Item 12:** Verify and document the sampler passes the diagnostic test by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Directions for running the diagnostics test is provided in ENV-CP-QP-045.

If a sampler has been inactivated (e.g., sample collection completed) prior to this inspection but continues to appear on the inspection form, change the “N/A” line to “Yes” on this task line. Subsequent questions regarding this sampler may be left unanswered in this section.

Warning

The internal pump tubing must be replaced if the pump tubing life has reached or exceeded the preset pump counts. The internal pump tubing life is set 500,000 pump counts for the 3700 and 1,000,000 for the Avalanche.

Only reset the pump counts after replacing the internal tubing.

If maintenance is necessary and can be performed at the time of inspection, describe the work performed. If maintenance cannot be completed at the time of inspection, then describe the condition and follow up with a description of work needed.

If a sampler has been inactivated (e.g., sample collection completed) prior to this inspection but continues to appear on the inspection form, change the “N/A” line to “Yes” on this task line. Subsequent questions regarding this sampler may be left unanswered in this section.

20. **Item 13:** Verify and document the sample tubing is free or clear of debris by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”.

Check the physical condition of the sampler including the actuator and intake line for correct location and height in the channel. The actuator, intake line and strainer (if used) should be placed on the cutting side of the channel to help minimize the possibility of sediment burying the intake line/strainer. Adjust as necessary to capture flow within the channel. The actuator, intake line and strainer must be clear of debris (sediment, pine needles, etc.).

If maintenance (e.g., clearing the tube, reposition tubing intake) is necessary and can be performed at the time of inspection, perform the work and describe. If maintenance cannot be completed at the time of inspection (e.g., can’t clear intake tubing and spare intake tubing not on hand to replace) then describe the condition and follow up with description of work needed.

21. **Item 14:** Verify and document the sample tubing has passed a suction test by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. Check the condition of sample tubing and vent tubing.

If maintenance (e.g., replace internal pump tubing) is necessary and can be performed at the time of inspection, perform the work and describe. If maintenance (e.g., replace sampler

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pump) cannot be completed at the time of inspection then describe the condition and follow up with description of work needed.

22. **Item 15:** Verify and document the sampler is ON prior to departing the site by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”.
23. **Item 16:** Verify and document the liquid level actuator has been set to “Latch” prior to departing the site by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”. If the sampler tripped and requires reset of the sampling program, reset the actuator by toggling the switch to “Reset” and then back to “Latch”.
24. **Item 17:** Verify and document the ISCO programming displays the following by clicking the expand arrow located on the right side of the task line and changing the “Complete” or “Failed” line to “Yes”.

ISCO 3700 sampler display should indicate “Sampler Inhibited”

OR

Avalanche sampler display should indicate “Program Disabled”

If an error occurs, reconfigure the sampler per EPC-CP-QP-045.

25. If the location has more than one sampler complete Steps 19 through 24 for each sampler.

4.1.6 Maintenance Information

26. **Item 18:** Verify and document any maintenance completed while on site that is not documented elsewhere on work order by changing the “Complete” or “Failed” line to “Yes”. Describe the work performed.

Maintenance items may include (but are not limited to) site clearing, installing new or additional equipment, removing equipment, animal/pest mitigation, problems with equipment location, etc.

If a battery was replaced record the voltage of the new battery and the battery identification number. If the battery does not have an identification number, contact the MSGP Program Manager to have one assigned. Once assigned, the number must be painted or written in a permanent manner on the battery.

27. **Item 19:** Verify and document any maintenance needed that could not be completed while on site that is not documented elsewhere on work order by changing the “Complete” or “Failed” line to “Yes”. Describe any work needed. Refer to EPC-CP-QP-045 for sampler operation and maintenance.

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4.1.7 Bottle Information

28. **Item 20:** Document water collected by clicking the expand arrow located on the right side of each bottle's task line and change the "Complete" or "Failed" line to 'Yes'. Record the following information for each bottle by position number in the carousel.

- Date (MM/DD/YY or MM-DD-YY) and time the ISCO collected water.
- Volume of water in the bottle
- Type of bottle (e.g. G for glass, P for poly)
- Specific ISCO displayed message, if present

If the sampler(s) did not trigger, change the "N/A" line to 'Yes' for Bottle #1 of each sampler and leave the other Bottle task lines unanswered.

If a sampler has been inactivated (e.g., sample collection completed) prior to this inspection but continues to appear on the inspection form, change the "N/A" line to "Yes" on this task line. Subsequent questions regarding this sampler may be left unanswered in this section.

29. If the location has more than one sampler complete Step 28 for each sampler.
30. Replace and secure the sampler top cover and secure the sampler shelter (if sampler is in a shelter).

4.2 Retrieving Samples

1. Don nitrile gloves and safety glasses.
2. Add up the volume of water collected (see flow chart in Attachment 3) and check that the total volume of water in glass and poly matches the required volume for the specific location identified in the MSGP Sampling and Analysis Plan. The volume of water required to complete analytical may vary by monitored location.
 - If sample volume is sufficient to fulfill all analytical requirements, continue with Step 3.
 - If sample volume is sufficient to fulfill part of the analytical requirements, consult the prioritization order on the MSGP Sampling and Analysis Plan to determine which analytical to fulfill OR contact the MSGP Data Manager, continue with Step 3 but retrieve only the volume needed.
 - If the collected sample will NOT fulfill the minimum required volume for any analytical:
 - Record total volume retrieved as "0" in **Item 8**
 - Complete a Visual Assessment (see EPC-CP-QP-064)
 - Pour out all water on the ground
 - Skip to Step 10 below

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CAUTION

ISCO Avalanche samplers are programmed to cool samples to 4°C. If water is collected and the refrigerator temperature reads higher than 6°C, **do not** retrieve samples that require ICE preservation. Refer to the MSGP Sampling and Analysis Plan for preservation requirements.

3. Remove filled and partially-filled bottles from the carousel.
4. For samples retrieved, immediately place lids onto the sample bottles and securely seal. Place custody seal tape on each bottle.
5. Write the date and time collected, Sampler Location number, and the corresponding carousel number on each retrieved sample bottle. Retrieve the sample collection date and time from the ISCO sampler.
6. Record total volume retrieved in **Item 8**.
7. Conduct a Visual Assessment (see EPC-CP-QP-064).
8. Place retrieved sample bottles in a cooler with blue ice (or equivalent).
9. Return any excess water or collected volume that exceeded the amount required to the ground at the location collected.
10. Install new certified clean sample bottles in the carousel to replace those bottles that collected stormwater. The number and type of bottles may vary. Ensure bottles match the configuration specified in the MSGP Sampling and Analysis Plan.
11. The 0.45 micron filter may also need to be replaced. Consult the most current revision of the Sampling and Analysis Plan for specifics. If the sampler is turned off for the quarter but new certified clean sample bottles and/or the filter have not been replaced, note this as follow-up maintenance required (see **Item 19**).
12. Replace and secure the center section of the sampler.
13. Return to steps in Section 4.1.

4.3 Completing the Inspection Form

1. When all task lines have been completed, make sure you have clicked the “Save” bar at the bottom of the page.
2. Click the “Back” arrow button in the upper left hand corner to exit the work order Tasks page and return to the Work Order Summary page.
3. Click the checkered flag in the upper right corner of the work order Summary page.

CAUTION

MC Express automatically changes the work order status to “Closed” and auto-populates the date and time fields.

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4. **Item 21:** Click on the expand arrow located on the right side of the “New Status” field and select “Completed” from the available dropdown menu. Ensure the date and time auto-populated are the date and time the inspection was completed.

If these fields need to be updated, click the “Date” field to modify it. Make necessary adjustments using the available timestamp application and click “Set” to apply changes.

6. **Item 22:** The inspector must type in his/her name in the “Labor Report Update” field.
Any additional notes, observations, or site conditions not documented in a task line “Reading” or “Comments” field can also be documented in the “Labor Report Update” field.
7. Scroll down the page to the “Signature” bar and click the expand arrow on the left side of the bar to open the “Signature” field.
8. **Item 23:** Capture an electronic signature by drawing with a finger on the tablet screen. The Lead Inspector is certifying that the information submitted is “true, accurate, and complete” by electronically signing the work order.

Note: If using MC Express on a desktop screen (not a tablet), the mouse must be used to sign electronically.

9. Click on the “Save” bar at the bottom of the page to close the “Signature” field.
10. Click on the “Back” button located in the upper left hand corner to return to the “My Open Work Orders” page.
11. Once you have completed an inspection, click on the Menu button again, and then click the “Logout” bar. Close the browser. All work will automatically uploaded from the MC Express application to the MC database.

Always log out of MC Express when you have finished work OR if work is interrupted.

4.4 REMOVING STORMWATER SAMPLES FROM THE FIELD

1. If samples were collected, deliver the samples and corresponding Sample Collection Log/Field Chain of Custody form to the EPC-CP Stormwater Program Laboratory at TA-59-1.
2. Sign the Sample Collection Log/Field Chain of Custody and place it with the sample(s) in the refrigerator. Ensure custody seal tape is intact on each sample bottle. Lock the refrigerator to prevent tampering. Refer to EPC-CP-QP-048, *Processing MSGP Stormwater Samples* for instruction on processing samples and submitting samples for shipping to an analytical laboratory.

5.0 TRAINING

The following personnel require training before implementing this procedure:

- EPC-CP technical staff and subcontract or other personnel who inspect automated stormwater samplers and retrieve stormwater samples for the MSGP.

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For EPC-CP staff the training method for this procedure is “self-study” (reading). Other participating groups may require training documentation pursuant to local procedures.

Personnel performing this procedure will be familiar with the most current versions of the following procedures and operation manuals:

- EPC-CP MSGP Sampling and Analysis Plan for the current monitoring year
- Manual for Teledyne ISCO Sampler Model 3700
- Manual for Teledyne ISCO Avalanche® sampler
- Manual for Teledyne ISCO 701 pH/Temperature module (if equipped at station)

Personnel performing steps in this procedure that involve electrical equipment **MUST** be trained to LANL electrical safety standards as prescribed in the IWD before performing those steps.

6.0 RECORDS

Records generated by this document will be submitted to the EPC-CP Records Management designated point of contact or document manager in accordance with P1020-1, *Laboratory Records Management* and with ADESH-AP-006, *Records Management Plan*.

- Completed ISCO Sampler Inspection and Sample Retrieval form(s)

7.0 DEFINITIONS AND ACRONYMS

7.1 Definitions

See LANL *Definition of Terms*.

7.2 Acronyms

See LANL *Acronym Master List*.

EPC-CP	Environmental Protection and Compliance-Compliance Programs
IWD	Integrated Work Document
LANL	Los Alamos National Laboratory
LANS	Los Alamos National Security, LLC
MC Express	Maintenance Connection MC Express web application
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System

8.0 REFERENCES

None.

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9.0 ATTACHMENTS

Attachment 1: Screenshot Examples of EPC-CP-Form-1010.02 in MC Express

Attachment 2: Crosswalk of EPC-CP-Form-1010.02 Hard Copy Format to Electronic Format Example

Attachment 3: Flow Chart for Sample Retrieval

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Attachment 1: Screenshot Examples of EPC-CP-Form-1010.02 in MC Express

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MC Express

WORK ORDERS
All Repair Centers / All Shops

- My Open Work Orders**
Open work orders assigned to me **3**
- My Completed Work Orders**
Completed work orders assigned to me **1**
- All Open (Unassigned)**
All open work orders that are unassigned **13**
- All Open (Not Complete)**
All open work orders that are not complete **115**
- All Open (Overdue)**
All overdue work orders that are not complete **9**
- All Open**
All open work orders **200**
- All Closed**
All closed work orders **6,662**

ASSETS
All Repair Centers / All Shops

- Asset Hierarchy**
Hierarchical view of assets
- Asset List**
List view of all assets **2,955**

Refresh

MC Express

WORK ORDERS
My Open Work Orders

- #MSGP-59941**
MSGP07302
ISCO Sampler Inspection and Sample Retrieval
12/31/2017
- #MSGP-4342**
TA-3-22 Power & Steam Plant
MSGP Single Stage Sampler Inspection
12/30/2016
- #MSGP-1423**
MSGP07302
MSGP Visual Assessment Example
12/31/2017

3 Records

Refresh

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Attachment 1: Screenshot Examples of EPC-CP-Form-1010.02 in MC Express (cont.)

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MC Express

WORK ORDER: MSGP-59941
Summary

[MSGP07302] MSGP07302
TA-3-38 Carpenter Shop
Issued

Hard Copy Inspection Example

- Tasks 44
- Assignments 1
- Labor 0
- Parts 0
- Other Costs 0
- Attachments 2
- Asset History 52
- More Work Order Detail...

Refresh List

MC Express

WORK ORDER: MSGP-59941
Tasks

ON ARRIVAL

- 20 Is sampler ON and functioning properly upon arrival?
Asset: [210C01437] ISCO 3700 Sampler
- 30 Does the sampler display "Sampler Inhibited"? If No, record specific message(s).
Asset: [210C01437] ISCO 3700 Sampler
- 40 Is sampler time delta < 1 min (MST)? If No, record adjustment
Asset: [210C01437] ISCO 3700 Sampler
- 50 Is sampler ON and functioning properly upon arrival?
Asset: [210J01522] ISCO Avalanche Sampler
- 60 Does the Avalanche display "Program Disabled"? If No, record specific message(s).
Asset: [210J01522] ISCO Avalanche Sampler
- 70 Is sampler time delta < 1 min (MST)? If No, record adjustment
Asset: [210J01522] ISCO Avalanche Sampler

Refresh List

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Attachment 1: Screenshot Examples of EPC-CP-Form-1010.02 in MC Express (cont.)

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MC Express

WORK ORDER: MSGP-59941
Edit Task

20
Is sampler ON and functioning properly upon arrival?
[210C01437] ISCO 3700 Sampler

Reading

Sampler knocked over by bear, power disconnected

Initials

Failed?

Yes

Not Applicable?

No

Complete?

No

Comments

Cancel Save

MC Express

WORK ORDER: MSGP-59941
Tasks

Water Collection Information

90
Is there evidence of flow? If YES (but no water collected), describe and record date/time of discharge.

100
Is any water collected? If YES, complete Bottle Information section.

110
If water was collected, record current refrigerator temperature (C).
Asset: [210J01522] ISCO Avalanche Sampler

120
If water was collected, record the pH measurement corresponding to the sample date/time: AVERAGE: ...
Asset: [211C01137] ISCO pH and Temp Module

Water Retrieval information

140
Was sample volume RETRIEVED? If Yes, record total volume retrieved.

150
Was a Visual Assessment performed? If Yes, complete the MSGP Visual Assessment form (EPC-CP-TP-064).

Refresh List

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Attachment 1: Screenshot Examples of EPC-CP-Form-1010.02 in MC Express (cont.)

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This screenshot shows the 'ON DEPARTURE' section of the MC Express interface. At the top, there is a blue header with a back arrow, the text 'MC Express', and a menu icon. Below the header, a grey bar displays 'WORK ORDER: MSGP-59941' and 'Tasks' on the left, and a checkered flag icon and a dropdown arrow on the right. A black bar with white text reads 'ON DEPARTURE'. Below this, two task items are listed:

- Item 10: A flag icon, the number 170, and the text 'Are electrical connections secure?'. A red box with the number 10 is to the left of the text. A right-pointing arrow is on the right.
- Item 11: A flag icon, the number 180, and the text 'Record voltage of battery(ies) powering sampler. Voltage(s) >=11.7V?'. A red box with the number 11 is to the left of the text. A right-pointing arrow is on the right.

 At the bottom, a blue bar contains an information icon, the text 'Refresh', a grid icon, and the text 'List'.

This screenshot shows the 'Equipment specific tasks' section of the MC Express interface. It has the same header and work order information as the first screenshot. A black bar with white text reads 'Equipment specific tasks'. Below this, six task items are listed:

- Item 12: A flag icon, the number 200, and the text 'Does the sampler pass the ISCO diagnostics test? Asset: [210C01437] ISCO 3700 Sampler'. A red box with the number 12 is to the left of the text. A right-pointing arrow is on the right.
- Item 13: A flag icon, the number 210, and the text 'Is intake tubing free/clear of debris? Asset: [210C01437] ISCO 3700 Sampler'. A red box with the number 13 is to the left of the text. A right-pointing arrow is on the right.
- Item 14: A flag icon, the number 220, and the text 'Does sample tubing pass suction test? Asset: [210C01437] ISCO 3700 Sampler'. A red box with the number 14 is to the left of the text. A right-pointing arrow is on the right.
- Item 15: A flag icon, the number 230, and the text 'Is sampler on upon departure? Asset: [210C01437] ISCO 3700 Sampler'. A red box with the number 15 is to the left of the text. A right-pointing arrow is on the right.
- Item 16: A flag icon, the number 240, and the text 'Has the actuator switch been reset to "Latch"? Asset: [210C01437] ISCO 3700 Sampler'. A red box with the number 16 is to the left of the text. A right-pointing arrow is on the right.
- Item 17: A flag icon, the number 250, and the text 'Does ISCO display "Sampler Inhibited" on departure? Asset: [210C01437] ISCO 3700 Sampler'. A red box with the number 17 is to the left of the text. A right-pointing arrow is on the right.

 At the bottom, a blue bar contains an information icon, the text 'Refresh', a grid icon, and the text 'List'.

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Attachment 1: Screenshot Examples of EPC-CP-Form-1010.02 in MC Express (cont.)

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The screenshot shows the MC Express interface for Work Order MSGP-59941. The 'Maintenance information' section is active, displaying two tasks. Task 330 asks if maintenance not described above was completed during inspection. Task 340 asks if follow-on maintenance not described above is required. Both tasks have a red flag icon with a number in a box (18 and 19 respectively) and a right arrow icon.

MC Express

WORK ORDER: MSGP-59941

Tasks

Maintenance information

330
18 Is any maintenance not described above completed during inspection? If Yes, describe.

340
19 Is any follow-on maintenance not described above required? If Yes, describe.

Refresh List

The screenshot shows the MC Express interface for Work Order MSGP-59941. The 'Bottle information' section is active, displaying a list of four tasks (360, 370, 380, 390) related to bottle collection. Each task asks for bottle type, collection date & time, volume, and/or any ISCO messages. All tasks have a red flag icon with a number in a box (20 and 21 respectively) and a right arrow icon.

MC Express

WORK ORDER: MSGP-59941

Tasks

Bottle information: IF bottle collected record bottle type (P or G), collection date & time, volume, and/or any ISCO messages

360
20 Bottle #1?
Asset: [210C01437] ISCO 3700 Sampler

370
Bottle #2?
Asset: [210C01437] ISCO 3700 Sampler

380
Bottle #3?
Asset: [210C01437] ISCO 3700 Sampler

390
Bottle #4?
Asset: [210C01437] ISCO 3700 Sampler

Refresh List

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Attachment 1: Screenshot Examples of EPC-CP-Form-1010.02 in MC Express (cont.)

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MC Express

WORK ORDER: MSGP-59941
Edit Task

360
Bottle #1?
[210C01437] ISCO 3700 Sampler

Reading
2/10/17 14:32; 1L poly; no more liquid detected

Initials

Failed?
No

Not Applicable?
No

Complete?
Yes

Comments

Cancel Save

MC Express

WORK ORDER: MSGP-59941
Status Update

Issued

New Status **21**
Completed

Date
03/16/2017 12:03 PM

Percent Complete 100%

Labor Report Update **22**
Select Comments to Add.....
Jane Admin

Cancel Save

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Attachment 1: Screenshot Examples of EPC-CP-Form-1010.02 in MC Express (cont.)

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MC Express

WORK ORDER: MSGP-59941
Status Update

Signature **23**

[\(Remove\)](#)

James Admin

Cancel Save

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Attachment 2: Crosswalk of EPC-CP-Form-1010.02 Hard Copy Format to Electronic Format

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Los Alamos National Lab - ADESH




Work Order MSGP-59941

MSGP Monitoring Stations
Printed 8/10/2017 - 11:25 AM (Duplicate Copy)

Maintenance Details

Requested By: Admin, Jane on 8/10/2017 11:23:00 AM
Procedure: MSGP ISCO Sampler Inspection and Sample Retrieval (EPC-CP-Form-1010.2 2)
Last PM: 7/20/2017
Project: ISCO Inspections wk 8/7/17 (P-MSGP-5212)
Reason: Hard Copy ISCO Sampler Inspection and Sample Retrieval

Target: 12/31/2017
Priority/Type: / Inspection
Department: Utilities and Infrastructure

 MSGP Program
 RG121.9
 TA-3-38 Carpenter Shop
 Monitored Outfall (073)
 MSGP07302

Contact: Admin, Jane
Phone: 123-4567


Tasks

#	Description	Meas.	No	N/A	Yes
ON ARRIVAL					
1 20	ISCO 3700 Sampler [210C01437] Is sampler ON and functioning properly upon arrival?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2 30	ISCO 3700 Sampler [210C01437] Does the sampler display "Sampler Inhibited"? If No, record specific message(s).		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3 40	ISCO 3700 Sampler [210C01437] Is sampler time delta < 1 min (MST)? If No, record adjustment		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
50	ISCO Avalanche Sampler [210J01522] Is sampler ON and functioning properly upon arrival?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
60	ISCO Avalanche Sampler [210J01522] Does the Avalanche display "Program Disabled"? If No, record specific message(s).		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
70	ISCO Avalanche Sampler [210J01522] Is sampler time delta < 1 min (MST)? If No, record adjustment		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water Collection information					
4 90	Is there evidence of flow? If YES (but no water collected), describe and record date/time of discharge.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5 100	Is any water collected? If YES, complete Bottle Information section.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6 110	ISCO Avalanche Sampler [210J01522] If water was collected, record current refrigerator temperature (C).		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7 120	ISCO pH and Temp Module [211C01137] If water was collected, record the pH measurement corresponding to the sample date/time: AVERAGE: MINIMUM: MAXIMUM:		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water Retrieval information					
8 140	Was sample volume RETRIEVED? If Yes, record total volume retrieved.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9 150	Was a Visual Assessment performed? If Yes, complete the MSGP Visual Assessment form (EPC-CP-TP-064).		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ON DEPARTURE					
10 170	Are electrical connections secure?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11 180	Record voltage of battery(ies) powering sampler. Voltage(s) >=11.7V?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Equipment specific tasks					
12 200	ISCO 3700 Sampler [210C01437] Does the sampler pass the ISCO diagnostics test?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13 210	ISCO 3700 Sampler [210C01437] Is intake tubing free/clear of debris?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14 220	ISCO 3700 Sampler [210C01437] Does sample tubing pass suction test?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15 230	ISCO 3700 Sampler [210C01437] Is sampler on upon departure?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16 240	ISCO 3700 Sampler [210C01437] Has the actuator switch been reset to "Latch"?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17 250	ISCO 3700 Sampler [210C01437] Does ISCO display "Sampler Inhibited" on departure?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Attachment 2: Crosswalk of EPC-CP-Form-1010.02 Hard Copy Format to Electronic Format (cont.)

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260	ISCO Avalanche Sampler [210J01522] Does the sampler pass the ISCO diagnostics test?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
270	ISCO Avalanche Sampler [210J01522] Is intake tubing free/clear of debris?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
280	ISCO Avalanche Sampler [210J01522] Does sample tubing pass suction test?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
290	ISCO Avalanche Sampler [210J01522] Is sampler on upon departure?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
300	ISCO Avalanche Sampler [210J01522] Has the actuator switch been reset to "Latch"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
310	ISCO Avalanche Sampler [210J01522] Does Avalanche display "Program Disabled" on departure?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Maintenance information				
18 330	Is any maintenance not described above completed during inspection? If Yes, describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19 340	Is any follow-on maintenance not described above required? If Yes, describe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bottle information: IF bottle collected record bottle type (P or G), collection date & time, volume, and/or any ISCO messages				
20 360	ISCO 3700 Sampler [210C01437] Bottle #1?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
370	ISCO 3700 Sampler [210C01437] Bottle #2?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
380	ISCO 3700 Sampler [210C01437] Bottle #3?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
390	ISCO 3700 Sampler [210C01437] Bottle #4?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
400	ISCO 3700 Sampler [210C01437] Bottle #5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
410	ISCO 3700 Sampler [210C01437] Bottle #6?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
420	ISCO 3700 Sampler [210C01437] Bottle #7?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
430	ISCO 3700 Sampler [210C01437] Bottle #8?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
440	ISCO 3700 Sampler [210C01437] Bottle #9?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
450	ISCO 3700 Sampler [210C01437] Bottle #10?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
460	ISCO 3700 Sampler [210C01437] Bottle #11?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
470	ISCO 3700 Sampler [210C01437] Bottle #12?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
480	ISCO Avalanche Sampler [210J01522] Bottle #1?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
490	ISCO Avalanche Sampler [210J01522] Bottle #2?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
500	ISCO Avalanche Sampler [210J01522] Bottle #3?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
510	ISCO Avalanche Sampler [210J01522] Bottle #4?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Labor Report				
Completed: 5/30/2017 4:44:00 PM				
Report: Jane Admin				
				
Signature / Name		5/30/2017	Date	
I confirm the information as recorded is true, accurate and complete.				

WO ID: _____ Page ____ of ____

21 Date: _____ Time: _____

22 Name/Z#: _____

Name/Z#: _____

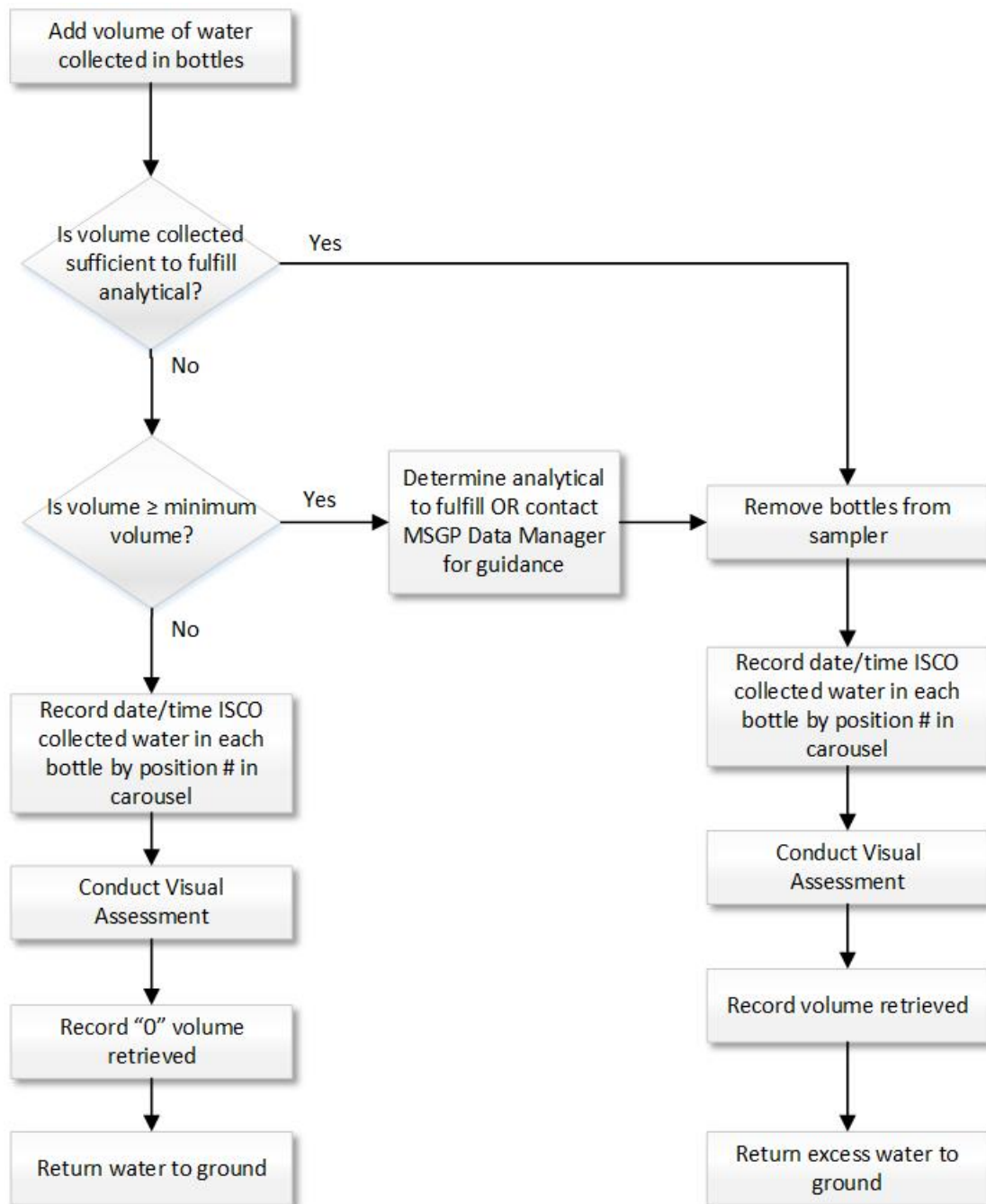
23 Lead Signature: _____

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

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Attachment 3: Flow Chart for Sample Retrieval

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ATTACHMENT 19: EPC-CP-QP-048 PROCESSING MSGP STORMWATER SAMPLES

ATTACHMENT 20: ENV-CP-QP-007 SPILL INVESTIGATION

ENV-CP-QP-007

Revision: 10



Effective Date: 09/30/15

Next Review Date: 09/30/18

Environment, Safety, Health Directorate**Environmental Protection – Compliance Programs****Quality Procedure****Spill Investigations****Reviewers:**

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Derivative Classifier: ☒ **Unclassified** ☐ **DUSA** **ENVPRO**

Name: Gian A. Bacigalupa	Organization: ENV-CP	Signature: Signature on File	Date: 08/31/15
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Responsible Line Manager: Michael T. Saladen	Organization: ENV-CP, Team Leader	Signature: Signature on File	Date: 08/31/15
Responsible Line Manager: Anthony R. Grieggs	Organization: ENV-CP, Group Leader	Signature: Signature on File	Date: 09/30/15

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History of Revisions

Document Number <i>[Include revision number, beginning with Revision 0]</i>	Effective Date <i>[Document Control Coordinator inserts effective date]</i>	Description of Changes <i>[List specific changes made since the previous revision]</i>
0	12/98	New Document.
1	06/00	Annual review, added Cerro Grande fire hazards
2	07/01	Annual review
3	06/03	Annual review
4	04/04	Annual review, changes to HCPs
5	02/07	Annual review, changes to reflect organizational restructure
6	07/08	Annual review
7	09/10	Biennial Review and revision
8	04/11	Removed prerequisites, added note re: on-call spill reporting.
9	07/13	Biennial review and revision, implemented new procedure format.
10	09/30/15	Biennial review and revision, implemented new procedure format. Controlled the updated LANL ENV-CP Unplanned Release Report.

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1.0 PURPOSE

This Environmental Protection Division – Compliance Programs Group (ENV-CP) procedure describes processes and implements requirements for spill investigations.

2.0 SCOPE

This procedure applies to all ENV-CP staff and personnel conducting spill investigations.

2.1 HAZARD REVIEW

The work described in this procedure is field work and has a **LOW hazard** rating as documented by submittal of a completed [ENV Low Hazard Verification form](#).

3.0 RESPONSIBILITIES

The following personnel require training before implementing this procedure:

- ENV-CP staff and contract personnel who perform spill response and investigation.

Annual re-training to this procedure is required. Specific training requirements will be updated as needed.

The training method for this procedure is required reading and on-the-job training (OJT). The OJT is to be conducted by a Team Leader or person designated as Subject Matter Expert (SME) by the ENV-CP Group Leader. This training will be documented in accordance with [ENV-DO-QP-115, Personnel Training](#).

Actions specified within this procedure, unless proceeded with “should” or “may,” are to be considered mandatory (i.e., “shall”, “will”, “must”).

3.1 PREREQUISITES

None

4.0 WORK PROCESSES

Responsibility is to assure the immediate mitigation and timely notification of appropriate regulatory organizations in the event of a spill or unplanned discharge that has or may affect the environment. Work requires frequent and unscheduled site visits to any area of the Laboratory during a spill or unplanned release as support staff for the on-scene Security and Emergency Operations (SEO) Incident Commander.

Specific activities associated with Spill Response and Investigation:

- Respond to the spill or unplanned release site;
- Report to the On-Scene SEO Incident Commander and Site Safety Officer;
- Receive site safety requirements;
- Provide decision support;
- Investigate the nature and extent of the spill or unplanned release;

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- Evaluate the potential environmental impact to water quality;
- Report the occurrence to the regulatory agencies, if necessary; and
- Provide support to mitigation plan and implementation.

4.1 FIELD ACTIVITY

If the spill or unplanned discharge is determined to be a non-emergency event by SEO response, such as a release of potable water, perform the following steps:

Step	Action
1	Perform a site visit in coordination with the Facility Operations Director designee.
2	Assess potential environmental damage.
3	Provide mitigation measures and requirements.
4	Document the event.
5	Notify regulatory agencies and DOE, if necessary.
6	Facilitate collection of samples, if necessary.

For emergency response, perform the following steps:

Step	Action
1	Report to on-scene commander and await instructions.
2	Perform a site visit in coordination with SEO.
3	Adhere to access requirements as developed by the SEO Site Safety Officer and Incident Commander.
4	Identify and document the source and cause of the release.
5	Provide notification and written report if necessary.
6	Facilitate collection of samples if necessary and safe to do so.

If sample collection is required, contact the following sampling personnel:

- ENV-CP
 - NPDES outfall
 - Sanitary treatment solids
- WM-SVS
 - Wastes and chemical spills (liquid, solid, hazardous)
- ADEP Environmental Remediation Division
 - Surface water
 - Storm water runoff
 - Groundwater
 - Sediments

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If WM-SVS will collect the required sample, complete a Request For Analysis (RFA), <http://int.lanl.gov/environment/waste/sampling.shtml>, to schedule sampling. Specify the analytical suite and turn-around time needed for the sample in the RFA.

4.2 COMMUNICATION

Take a cellular phone that will transmit from the location to be visited. Also take a contact pager to receive messages.

If cellular service is unavailable, use a portable radio set to the appropriate radio frequency.

If in a secure area where cell phone use is prohibited, use the radio. Be sure to have radio checked and authorized for use within secure areas or within the boundaries of the WFO FOD or WX Division. Government-owned cellular phones, with batteries removed, may be brought into the secure area but used only if approval is given by the SEO Incident Commander or FOD or designee. Rules of use for Smartphones and other mobile devices (BlackBerry, iPhones, iPads) can be found on the Computing Communications webpage for mobile devices, <http://int.lanl.gov/computing/communications/mobile/index.shtml>.

Radio or cellular contact must be established with a designated contact prior to leaving ENV-CP and upon arrival/departure at the site in accordance with [ENV-DO-QP-100, General Field Safety](#).

The Incident Commander can make special communication exceptions.

All photography at LANL must adhere to [P217, Controlled Articles](#).

Wastes generated from activities described in the procedure will be properly characterized, managed, and disposed in accordance with [P409, LANL Waste Management](#), [P930-1, LANL Waste Acceptance Criteria](#), and [P403, Environmental Risk Identification and Management](#).

4.3 FACILITY MANAGEMENT WORK CONTROL REQUIREMENTS FOR FIELD ACTIVITIES

Most field activities performed by the ENV-CP spill response personnel are impacted by facility management work control requirements. Requirements vary between the respective Facility Operations Divisions (FODs) and therefore necessitate ENV-CP response personnel to acquire FOD approval for site access in advance of starting work activities. The exception to this is in response to emergency situations as support to SEO staff.

Should work be required to stop/pause, reference [P101-18, Procedure for Pause/Stop Work](#), for guidance.

4.4 FACILITY MANAGEMENT-SPECIFIC ACCESS REQUIREMENTS

4.4.1 HIGH EXPLOSIVES AREAS

TA-16 and TA-11 high explosives areas have specific access requirements. Access inside the security gate requires annual site-specific training. Curricula #5243 must be assigned and all the training courses completed before arriving at TA-16. For access, (normal or after hours) contact the WFO FOD to ensure entry requirements are met and the activity is authorized for the Plan of the Day.

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For access to WFO perimeter gates during normal working hours or after hours, contact TA-15 Access Control at 667-6742 and request permission to enter. A perimeter gate key must be picked up at the TA-15 Access Control office. Note that all outdoor firing will be suspended during entry.

For perimeter gates, prior notification for after-hours entry is also required by SOC. Perform the following steps:

Step	Action
1	Call SOC Los Alamos at 667-4437.
2	Identify yourself to the on duty officer or attendant.
3	Provide the following information: Group, color and make of vehicle (s), which perimeter gate you are entering, and approximate time of arrival and finally, length of stay.

Failure to notify security personnel in advance could result in a security violation against the visiting Team Member.

Provide notification to SOC Los Alamos at 667-4437 when leaving area.

For access to WX areas required during normal or after working hours, perform the following steps:

- Ensure the required security clearance (Q clearance) is held, and
- Contact the FOD or designee for entry requirements.

4.4.2 CHEMISTRY METALLURGY RESEARCH FACILITY ACCESS

For access to the Chemistry Metallurgy Research Facility, perform the following:

- Must have the required L or Q clearance to pass the security gate.
- If access into any of the buildings is necessary, contact CMR Operations Management or the FOD for an escort.
- If responding to an emergency with SEO, ENV-CP staff will be considered part of the SEO response team, met at the access gate, and escorted to the spill site.

4.4.3 TA-3-66 SIGMA FACILITY ACCESS

For access to the Sigma facility (TA-3-66), perform the following:

- For non-emergency responses, obtain prior site-specific training and authorization or contact the FOD for personnel escort and contact the FOD Deployed Environmental Professional.
- For emergency response with SEO, ENV-CP staff will be considered part of the SEO response team, met at the access gate, and escorted to the spill site. Contact the FOD to ensure they are aware of the incident.

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4.5 REGULATORY SPILL REPORTING

If a spill is determined to be a threat to the environment or human health, regulatory and DOE notification may be necessary. Contacts and telephone numbers can be found on Attachment 1, ENV-CP Release Notification Phone List.

If a spill impacts a Solid Waste Management Unit (SWMU) or Area of Concern (AOC), contact ENV-CP and Environmental Remediation (ER) for possible additional notification requirements.

If ENV Division or designated SME personnel determine after a site inspection or verbal notification that a spill is non-reportable to DOE or applicable regulatory agencies, a LANL ENV-CP Unplanned Release Report must be completed (Attachment 2) and submitted to the ENV-CP SME for required documentation.

For ENV Division designated on-call personnel, follow guidance for spill reporting as described in [ENV-DO-QP-101, *Environmental Reporting Requirements for Releases or Events*](#).

NOTE: On-call representatives are required to follow up in writing (email is sufficient) with the spills program lead regarding all releases during their on-call schedule. If no spills are reported in off-work hours, please confirm in writing with the spills program lead at the end of your on-call schedule.

For additional information concerning spill and unplanned discharge determination and notification requirements, contact the ENV-CP Water Quality Permitting and Compliance Team Leader.

5.0 DOCUMENT CONTROL/RECORDS MANAGEMENT

The following records generated as a result of this procedure are to be submitted in accordance with [ADESH-AP-006 Records Management Plan](#).

- Field notebook documentation of the release including:
 - Time and date of the release
 - Time and date of ENV-CP notification
 - Location of the release
 - Source of the release(equipment, etc,)
 - Type of material released
 - Quantity of material released
 - If an impact to a watercourse or Potential Release Site occurred
 - Time release was stopped
 - Any immediate mitigating actions implemented to contain or control the release
- Any written report and verbal notification list generated should the release be deemed reportable.
- LANL ENV-CP Unplanned Release Report (Attachment 2) for non-reportable releases.

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6.0 DEFINITIONS

AOC: Area of Concern

ER: Environmental Remediation

Field Work: Performance of Laboratory related activities in areas that are removed or isolated from an established populated base of operation (that is, where emergency support and medical assistance is not readily available.)

FOD: Facility Operations Division

NPDES: National Pollutant Discharge Elimination System

OJT: On the job training

PRS: Potential Release Site

SEO: Security and Emergency Operations

SOC Los Alamos: Security contractor for Los Alamos National Laboratory

SWMU: Solid Waste Management Unit

7.0 REFERENCES

None

8.0 ATTACHMENTS

Attachment 1- ENV-CP Release Notification Phone List

Attachment 2- LANL ENV-CP Unplanned Release Report

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ATTACHMENT 1- ENV-CP RELEASE NOTIFICATION PHONE LIST

Los Alamos National Laboratory

ENV-CP

Release notification phone list

August 2015

Los Alamos National Laboratory

- | | |
|--|----------|
| (1) Security and Emergency Operations
Emergency Management (SEO-EM) | 667-6211 |
| (2) ENV-ES Group Office | 665-8855 |
| (3) ENV-CP Group Office | 667-0666 |
| (4) ENV-DO | 667-2211 |
| (5) LANL Central Alarm Station (SOC-LA) | 667-7080 |
| L.A. Fire Department | 667-4055 |

New Mexico Environment Department

See Web address below

- | | |
|--|-----------------|
| (1) NMED Emergency Hotline (24 hours a day) | 827-9329 |
| (2) NMED Non-Emergency Hotline (During business hours) | 476-6000 |
| NMED Non-Emergency Hotline (Voicemail; 24 hours a day) | 1(866) 428-6535 |
| (3) NMED Surface Water Quality Bureau | 827-0187 |
| Erin Trujillo | 827-0418 |
| (4) NMED Ground Water Quality Bureau | 827-2900 |
| Greg Huey | 827-6891 |
| Steven Huddleson | 827-2936 |
| Gerald Knutson | 827-2996 |
| (5) NMED Hazardous Waste Bureau | 476-6000 |
| Ruth Horowitz | 476-6025 |

U.S Environmental Protection Agency

- | | |
|---|-----------------|
| (1) US EPA Region 6 Spill Reporting (During business hours) | 1(800) 887-6063 |
| Emergencies- Contact the NRC | 1(800) 424-8802 |
| (2) Gladys Gooden-Jackson | 1(214) 655-7494 |

U.S. Department of Energy

- | | |
|-----------------|----------|
| (1) Gene Turner | 667-5794 |
|-----------------|----------|

State Emergency Response Commission (SERC) Notification

- | | |
|---|--|
| New Mexico State Police | (505) 827-9300 (During business hours) |
| (Immediate Notification) | (505) 827-3476 (24 hours a day) |
| New Mexico Department of Homeland Security and Emergency
Management (Follow-up Notification) | (505) 476-9600 |

National Response Center

- | | |
|---|----------------|
| U.S. Coast Guard National Response Center | 1-800-424-8802 |
| See NRC web address below for report form | |

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New Mexico State Police

New Mexico State Police

(505)827-9300 (During business hours)

(505) 827-3476 (24 hours a day)

Local Emergency Planning Committee (LEPC) LAPD

Philmont Taylor

(505) 663-3511

On Call Environmental Contact for Releases
Group Representatives for Notifications to External Agencies

Name	Group	Work Phone	Pager	Cellular Phone	Email address
Jake Meadows	ENV-CP	606-0185	664-1333	231-0460	jmeadows@lanl.gov
Mike Saladen	ENV-CP	665-6085		699-1284	saladen@lanl.gov
Mark Haagenstad	ENV-CP	665-2014		699-1733	mph@lanl.gov
Tim Zimmerly	ENV-CP	664-0105	664-1237	699-7621	tzimmer@lanl.gov
Terrill Lemke	ENV-CP	665-2397		699-0725	tlemke@lanl.gov

Web addresses:

NMED home page <http://www.nmenv.state.nm.us>

National Response Center home page <http://www.nrc.uscg.mil/Default.aspx>

Reportable Quantities web page <http://homer.ornl.gov/rq/>

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ATTACHMENT 2- LANL ENV-CP UNPLANNED RELEASE REPORT

Los Alamos National Laboratory Environmental Compliance Programs (ENV-CP) Unplanned Release Report

Form Completed By:		Telephone:		Group:	
Spill Details		Spill Owner (Specify): <input type="checkbox"/> LANS, LLC <input type="checkbox"/> Subcontractor:			
Date of Spill/Date Spill Discovered:					
Location:					
Material Spilled:		<input type="checkbox"/> Anti-freeze/coolant <input type="checkbox"/> Steam Condensate <input type="checkbox"/> Lubricants/oils <input type="checkbox"/> Refrigerant Oil		<input type="checkbox"/> Gasoline <input type="checkbox"/> Other: _____	
<input type="checkbox"/> Hydraulic Fluid <input type="checkbox"/> Potable Water <input type="checkbox"/> Diesel					
Volume Spilled:		Waste Volume Generated:			
Source of Spill: Vehicle ID: _____ Equipment ID: _____		<input type="checkbox"/> Hydraulic Line <input type="checkbox"/> Potable Water Line <input type="checkbox"/> Fire Suppression System <input type="checkbox"/> Fuel Tank		<input type="checkbox"/> Radiator <input type="checkbox"/> Condensate Line <input type="checkbox"/> Other: _____	
Describe the spill response in chronological order. Include response personnel, steps taken to contain the spill, and steps/spill control equipment used to clean it up. Please indicate if corrective actions have been completed and describe actions taken to prevent spill recurrence:					
Date Corrective Actions Completed: _____					
Did the spill enter or impact any of the following? (Check as many as apply) <input type="checkbox"/> RCRA Treatment Storage Disposal Facility <input type="checkbox"/> RCRA Satellite Accumulation Area <input type="checkbox"/> RCRA <90 Day Storage Area		<input type="checkbox"/> Floor Drain, if so please indicate affected facility _____ <input type="checkbox"/> Watercourse/drainage area, if so please indicate _____ <input type="checkbox"/> Solid Waste Management Unit/Area of Concern, if so please indicate _____ <input type="checkbox"/> None			
Did the spill occur inside or outside a building?		<input type="checkbox"/> Inside <input type="checkbox"/> Outside			
Did the spill occur on: (Check as many as apply)		<input type="checkbox"/> Concrete <input type="checkbox"/> Asphalt <input type="checkbox"/> Carpeted Floor <input type="checkbox"/> Graveled/Rocky Area <input type="checkbox"/> Tile <input type="checkbox"/> Soil/Vegetated Area <input type="checkbox"/> Wooden floor/deck <input type="checkbox"/> Other: _____			
Samples Collected: <input type="checkbox"/> None <input type="checkbox"/> Water		<input type="checkbox"/> Soil <input type="checkbox"/> Air <input type="checkbox"/> Other: _____		If samples were collected, indicate analytical suite:	
Certification					
I certify that I am knowledgeable about the information on this form. The information, to my knowledge, is true, accurate, and complete.					
Name of Certifying Official:		Organization:		Date:	
Certification:					
Completed by ENV-CP Personnel					
Date Received:	Severity Index:	Causal Analysis:	<input type="checkbox"/> Non-Reportable <input type="checkbox"/> Reportable		

ATTACHMENT 21: SITE SPECIFIC PROCEDURES AND DOCUMENTS