



## **DRAFT INDIVIDUAL PERMIT UPDATE**

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#### U.S. DEPARTMENT OF OFFICE OF ENVIRONMENTAL MANAGEMENT

#### **OVERVIEW**

- Submitted re-application in July 2019
- Public notice issued by Environmental Protection agenda on November 30, 2019
  - Draft permit proposed to replace the current permit with effective date of November 1, 2010

**Draft Permit Summary** 

- Expiration date of March 31, 2014
- Suspends the previous draft permit public notice on March 28, 2015
- Administratively continued permit ongoing
- EPA public meeting & hearing
  - Originally scheduled for January 16, 2020
  - Held October 26, 2020
- Certification by New Mexico Environment Department will be forthcoming
  - Final Individual Permit will not be issued until the certification requirements of Section 401 have been met
- Link to EPA draft permit
  - Available on IP website <a href="https://ext.em-la.doe.gov/ips/">https://ext.em-la.doe.gov/ips/</a>







### EPA PROPOSED CHANGES

- Confirmation monitoring requirements
  - Annual Sampling Implementation (SIP) Plan
    - Summarize changes to sampling locations
    - Summarize changes to pollutants of concern (POCs) based on new data

**EPA Proposed IP Changes** 

- Sampling procedures
  - Collection of partial samples used for compliance
  - Sufficiently sensitive methods will be used
- Site-specific demonstration (SSD)
  - Run-on and runoff evaluation, or
  - Tiered approach using 90% Background Threshold Values (BTVs)
- New inspection category for Long-Term Stewardship Sites
  - Sites where confirmation sample results > Target Action Level (TAL), but <90% BTV</li>
- Best Management Practice (BMP) inspection trigger change from .25"/30-minutes to .5"/30-minutes







#### PERMITTEE COMMENTS

- Use of 2018-19 Background Threshold Value (BTV) Report
- Polychlorinated biphenyls (PCBs) TAL
- Active sites or sites located outside of DOE property
- List of sites not to be included in the permit renewal
  - Administrative changes
  - Significant industrial materials (SIMs) were not used or were remediated

**N3B** Comments

- No longer Resource Conservation and Recovery Act (RCRA) sites
- Samplers were operational but didn't collect sample during 25-yr/24-hr event













# **Questions?**

