



DRAFT INDIVIDUAL PERMIT UPDATE

Steve Veenis – Water Program Director





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 https://ext.em-la.doe.gov/ips/







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
- 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?

