

# for

# Technical Area 54 Maintenance Facility West

Newport News Nuclear BWXT-Los Alamos, LLC (N3B) 600 Sixth Street Los Alamos, NM 87544 (505) 661-5918

# April 2019

# EM2019-0116

### POINT OF CONTACT INFORMATION

Regulatory & Stakeholder Interface Manager: Frazer Lockhart (505) 257-8049; email: frazer.lockhart@em-la.doe.gov 600 Sixth Street, Los Alamos, NM 87544

## TABLE OF CONTENTS

1.0	Facility Description and Contact Information	-
	<ul> <li>1.1 Facility Description</li> <li>1.2 Contact Information/Responsible Parties</li></ul>	1 3 4 6 6
2.0	Potential Pollutant Sources	7
	<ul> <li>2.1 Potential Pollutants Associated with Industrial Activity</li></ul>	7 7 8 8
3.0	Storm water Control Measures	9
	3.1       Non-Numeric Technology-Based Effluent Limits (BPT/BAT/BCT).         3.1.1       Minimize Exposure.         3.1.2       Good Housekeeping         3.1.3       Maintenance.         3.1.4       Spill Prevention and Response.         3.1.5       Erosion and Sediment Controls         3.1.6       Management of Runoff.         3.1.7       Salt Storage Piles or Piles Containing Salt.         3.1.8       Dust Generation and Vehicle Tracking of Industrial Materials.         3.2       Sector-Specific Non-Numeric Effluent Limits         3.3       Numeric Effluent Limitations Based on Effluent Limitations Guidelines.         3.4       Water Quality-based Effluent Limitations and Water Quality Standards.	990111222222
4.0	Schedules and Procedures1	3
	4.1       Good Housekeeping.       1         4.2       Maintenance       1         4.3       Spill Prevention and Response Procedures.       1         4.3       Erosion and Sediment Control       1         4.4       Erosion and Sediment Control       1         4.5       Employee Training.       1         4.6       Facility Routine Inspections and Quarterly Visual Assessments       1         4.6.1       Routine Facility Inspections       1         4.6.2       Quarterly Visual Assessment of Storm water Discharges       1         4.7       Monitoring       1	333445567
5.0	Documentation to Support Eligibility Considerations Under Other Federal Laws1	9
	<ul> <li>5.1 Documentation Regarding Endangered Species</li></ul>	9 21
6.0	Corrective Actions and Deadlines2	2
	<ul><li>6.1 Immediate Actions</li></ul>	:2 :2
7.0	SWPPP Certification2	3
8.0	SWPPP Modifications	4
Attac	chment A General Location Map2	5

Attachment B	Site Map	
Attachment C	Relevant Procedures	
Attachment D	Routine Facility Inspections Form and Reports	
Attachment E	Quarterly Visual Inspection Form and Reports	
Attachment F	SWPPP Modifications	
Attachment G	Reference Documents	

# Figure

Figure 5.1-1	Endangered species	habitat within LANL	
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## Tables

Table 1.3-1	Storm water PPT Roles & Responsibilities	.5
Table 2.1-1	Potential Pollutants Associated with Industrial Activity	.7
Table 2.1-2	MFW Areas Where Potential Spills/Leaks Could Occur	.7
Table 4.7-1	Control Values – Outfall 049 (54-MFW-1)	18

# 1.0 Facility Description and Contact Information

# 1.1 Facility Description

# Facility Information:

Name of Facility:	Los Alamos Nationa	al Laboratory (I	LANL)		
Street:	600 Sixth Street				
City:	Los Alamos	State:	NM	ZIP Code:	87544
County or Similar Subd	livision: <u>TA-54 Ma</u>	intenance Facili	ity West (TA	A-54 MFW)	
National Pollutant Disc	harge Elimination Sys	tem (NPDES) I	D: <u>NMR0</u>	950011 (i.e., Pe	ermit No.)
Primary Industrial Acti	vity SIC code:			423	1
Sector (2015 MSGP, A)	ppendix D and Part 8)	:		Secto	or P
Subsector (2015 MSGP	, Appendix D and Par	t 8):		Subsect	cor P1
Co-located Industrial A	ctivity SIC code:			Not Applica	ble (N/A)
Sector (2015 MSGP, A	ppendix D):			N/A	4
Subsector (2015 MSGP	, Appendix D):			N/A	A
Latitude and Longitud	le:				
Latitude:			35.	.837249 ° N (de	ecimal degrees)
Longitude:	Longitude: -106. 255215 ° W (decimal degrees)				
Method for determining	Method for determining latitude/longitude (check one): USGS topographic map (scale:)				
		$\boxtimes$	Other (spec	cify): <u>Google</u>	Earth
Horizontal Reference	Datum (check one):	NAD 27	[] N.	AD 83	🔀 WGS 84
Is the facility located in	Indian country?	<b>YES</b>	N	0	
If yes to the above question then provide name of ReservationIf no to the above question then indicate "N/A"N/A					
Are you considered a "	Are you considered a "Federal Operator" of the facility? XES INO				
<b>Federal Operator</b> – an entity that meets the definition of "operator" in this permit and is either any department, agency or instrumentality of the executive, legislative and judicial branches of the Federal government of the United States, or another entity, such as a private contractor, operating for any such department, agency, or instrumentality.					

Estimated area of industrial activity at site exposed to storm water: 0.93 acres

1.1 Facility Description (continue	d)			$\cap$
Discharge Information:				- and the second
Does this facility discharge storm water into sewer system (MS4)?	a municipal separate storm	YES	NO	
If yes, provide name of MS4 operator:	N/A			
Name(s) of surface water(s) that receive	storm water from your facility:			
Direction of storm water flow	on the site is primarily to the south	into Pajarito	o Canyon.	
Does this facility discharge industrial storm of "impaired water"? (Ref. 2015 MSGP, Ap	water directly into any segment pendix A definitions)	🛛 YES	NO	
If <i>yes</i> , identify name of the impaired wat (Lower LANL boundary to Twomile Ca	er(s) and segment(s), if applicable:_ nyon)	Pajarito (	<u>Canyon</u>	
Identify pollutant(s) causing impairment aluminum, copper (dissolved), adjusted	(s): <u>polychlorinated biphenyls (PCB</u> gross alpha, and total recoverable cy	<u>s), total reco</u> <u>vanide</u>	overable	
Which pollutant(s) identified may, be pre-	sent in industrial storm water discha	arges from th	nis facility?	
	None			
Has a total maximum daily load (TMDL identified pollutants?	) been completed for any of the	YES	NO	0
If yes, list TMDL pollutants:	N/A			_
Does this facility discharge industrial storm designated as a Tier 2. Tier 2.5 or Tier 3 wat	water into receiving water er?			
(Ref. 2015 MSGP, Appendix A definitions)		🗌 YES	🛛 NO	
Are any of your storm water discharges subj guidelines (ELGs)? (Ref. 2015 MSGP Table	ect to effluent limitation (1-1)	YES	🛛 NO	
If yes, which guidelines apply?	N/A			

$\frown$	1.2 Contact Int	formation/Responsible Parties			
	Facility (Site) Operator(s):				
	Name: Address:	Newport News Nuclear BWXT-Los Alamos, LLC 600 Sixth Street Los Alamos, NM 87544 Telephone Number: 505-661-5918			
	Facility Owner(s):				
	Name:	Contact Handled Transuranic Operations TA-54 Operations Center (505) 257-8400			
	Address:	600 Sixth Street Los Alamos, NM 87544			
	Primary POC:	Gail Helm, Ops Center Manager Organization: Contact Handled Transuranic Waste Phone: (505) 309-1319 Email: gail.helm@em-la.doe.gov			
$\bigcirc$	Secondary POC:	John Guy, Shift Operations Manager/Katheryn Sandoval, Shift Operations Manager Organization: Contract Handled Transuranic Waste Phone : (505) 309-1320/(505) 257-8614 Email : john.guy@em-la.doe.gov katheryn.sandoval@em-la.doe.gov			
	Site SWPPP:				
	POC:	Frazer Lockhart Organization: Regulatory and Stakeholder Interface Manager Phone : (505) 257-8049 Email : Frazer.Lockhart@em-la.doe.gov			
	Facility SWPPP:				
	Primary POC:	John Guy/Katheryn Sandoval Organization: Contact Handled Transuranic Waste Phone: (505) 309-1320/(505) 257-8614 Email: john.guy@em-la.doe.gov/katheryn.sandoval@em-la.doe.gov			
	Secondary POC:	Jennifer von Rohr Organization: Regulatory and Stakeholder Interface Phone: (505)695-4365 Email: jennifer.vonrohr@em-la.doe.gov			

#### **1.3 Storm water Pollution Prevention Plan / Team Members**

The Newport News Nuclear BWXT-Los Alamos, LLC- (N3B-) controlled facilities located at Los Alamos National Laboratory (LANL) operate under the National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit (MSGP) for Storm water Discharges Associated with Industrial Activities, which governs storm water discharge from industrial activities.

Under this permit, the U.S. Environmental Protection Agency (EPA) requires the implementation of a Storm Water Pollution Prevention Plan (SWPPP), which must be developed in accordance with the provisions of the Clean Water Act (33 U.S.C. 1251 et seq.), and the regulations established by the EPA for the NPDES MSGP for Storm water Discharges Associated with Industrial Activity [Federal Register 73, 56572], herein referred to as the 2015 MSGP (<u>https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\_finalpermit.pdf</u>).

Before April 30, 2018, all activities associated with the 2015 MSGP in relation to the Technical Area 54 (TA-54) Maintenance Facility West (MFW) were performed by Los Alamos National Security, LLC (LANS). The U.S. Department of Energy (DOE) awarded the Los Alamos Legacy Cleanup Contract (LLCC) to N3B effective April 30, 2018. As part of the LLCC, N3B assumed control of TA-54 MFW.

The 2015 MSGP requires control measures, schedules/procedures, and documentation to support eligibility considerations under other federal laws be included as part of this SWPPP. The 2015 MSGP also requires that a notice of intent (NOI) be filed a minimum of 30 days before commencing discharge in accordance with the terms of the 2015 MSGP. N3B submitted an NOI to operate under the 2015 MSGP for the TA-54 MFW on or about April 5, 2018, and coverage under the permit began on May 2, 2018. N3B updated this NOI on April , 2018, to reflect changes incorporated into this SWPPP and updates to the New Mexico Clean Water Act 303(d) and 305(b) integrated list of water quality impairments.

The purpose of this SWPPP is to ensure that all potential sources of storm water pollution at the TA-54 MFW are documented. The SWPPP also describes specific storm water control measures, also known as best management practices (BMPs), that are used to reduce or eliminate pollutants in storm water discharges and identifies implementable processes and procedures in place to comply with the terms and conditions of the 2015 MSGP. Through potential pollutant reduction, environmental problems that result in lost resources and costly restoration activities may be averted. BMPs include maintenance activities, formalized work practice reviews, training, activity scheduling, stabilization, structural controls, and additional documentation to support eligibility considerations and to include endangered species and historic properties.

This SWPPP is intended to be a living document and updates may be necessary as the result of a corrective action, or when industrial activities or storm water controls change. Accordingly, the 2015 MSGP requires prompt revision of the SWPPP to reflect such changes.

This SWPPP applies to storm water discharges associated with industrial activities at LANL from vehicle and heavy equipment maintenance operations conducted at TA-54 MFW by N3B personnel. This facility is under the control of the Contact-Handled Transuranic (CH-TRU) Program. Operations conducted at this facility fall within the MSGP requirements for Sector P, Land Transportation and Warehousing.

#### **Team Members**

The facility has established a storm water Pollution Prevention Team (PPT), which is responsible for (1) the development, implementation, maintenance, and revision of this SWPPP and (2) maintaining control measures and taking corrective actions, as required. In addition, PPT members receive SWPPP

training as part of membership requirements (see Table 1.3-1*Storm water* and section 4.5, *Employee Training* for a complete summary).

Storm water PPT members are N3B representatives from cross-functional integrated project teams, including the Environmental Remediation Surface Water Program, the CH-TRU Program, and the Regulatory and Stakeholder Interface (R&SI) organization. Storm water PPT team participants are selected based on knowledge of heavy equipment maintenance activities and the potential impact of these activities on storm water runoff. Storm water PPT duties include collecting samples and visually examining storm water runoff for compliance under the NPDES permit/regulations.

Role	Responsibilities
Regulatory and	Implements the SWPPP and associated BMPs
Stakeholder Interface	<ul> <li>Oversees the assigned duties of PPT members</li> </ul>
r rogram manager	<ul> <li>Ensures inspection problems are remedied/corrected</li> </ul>
	<ul> <li>Assists or designates a representative to assist in performing routine facility inspections (RFIs) in accordance with section 4.6, <i>Facility Routine Inspections</i> and Quarterly Visual Inspections of this SWPPP</li> </ul>
	<ul> <li>Ensures training as required by the 2015 MSGP is available and the appropriate N3B personnel receive the training specified in section 4.5, <i>Employee Training</i> of this SWPPP</li> </ul>
Environmental	Provides SWPPP technical guidance
Remediation Surface	<ul> <li>Provides BMP guidance (selection and installation)</li> </ul>
water i rogram ceau	<ul> <li>Aids in performing and documenting inspections and assessments</li> </ul>
	<ul> <li>Performs site compliance evaluations</li> </ul>
CH-TRU Shift Operations	Oversees good housekeeping practices
Manager	Oversees BMP maintenance
	<ul> <li>Ensures operators receive SWPP/2015 MSGP-required training</li> </ul>
	<ul> <li>Notifies the R&amp;SI compliance lead when there is a development or change in facility operations that may require a revision to the SWPPP or change to control measures</li> </ul>
CH-TRU Operations Staff	Assists with cleanup as necessary (i.e., spilled or released pollutants)
	Directs the appropriate waste management of all resultant cleanup materials
R&SI Regulatory	Develops SWPPP training
Compliance Lead	Provides SWPPP technical guidance
	<ul> <li>Conducts recordkeeping and regulatory reporting</li> </ul>
	<ul> <li>Ensures corrective actions are scheduled and implemented in a timely manner and in accordance with the permit</li> </ul>
	<ul> <li>Provides oversight of the SWPPP (e.g., revisions, etc.)</li> </ul>
	<ul> <li>Ensures inspection documents and other records related to the SWPPP and storm water pollution control measures are managed in accordance with the existing NPDES permit and N3B records management requirements</li> </ul>

Table 1.3-1					
Storm	water	PPT	Roles	and	Responsibilities

Role	Responsibilities
Maintennance Connection Storm Water Database	<ul> <li>Maintains and updates the CADB based on input from MSGP Storm Water Team personnel</li> </ul>
Administrator	<ul> <li>Responsible for the generation of Routine Facility Inspection work statements</li> </ul>
en en station en	Generates and updates MSGP corrective action status reports

## 1.4 Site Description

TA-54 MFW is located on Mesita del Buey approximately 2 mi east from the Pajarito and Rex Road intersection between Pajarito Canyon to the south and Cañada del Buey to the north. TA-54 MFW is located just south of Mesita del Buey Road between buildings 54-0533 to the west and 54-0247 to the east.

Industrial activities conducted at the site are described as vehicle and heavy equipment maintenance and repair. Activities that are or may be conducted outdoors include vehicle and equipment maintenance and repair, vehicle and equipment storage and parking, loading/unloading, material storage, and waste storage. Materials stored on-site include vehicles and equipment awaiting maintenance, lubricating fluids, antifreeze, cleaners, equipment parts, miscellaneous equipment designated for salvage or disposal, universal waste, used oil, recyclables, and trash. Operations at these facilities fall within the NPDES MSGP requirements for Sector P, Land Transportation and Warehousing. Vehicle and heavy equipment maintenance and repair activities at the TA-54 MFW are conducted by N3B CH-TRU maintenance personnel.

The average annual rainfall for Los Alamos is 18.51 in. Intense thunderstorms are common in the Los Alamos area during August and September. The New Mexico Water Quality Control Commission standard for limited aquatic life applies to the receiving water for this facility. Pajarito Canyon (lower LANL boundary to Twomile Canyon) is listed as impaired for polychlorinated biphenyls (PCBs), total recoverable aluminum, dissolved copper, adjusted gross alpha, and total recoverable cyanide.

### 1.5 General Location Map

A general location map identifying the location of the TA-54 MFW and all receiving waters for storm water discharges is included as Attachment A, General Location Map.

### 1.6 Site Map

The industrial site is 0.93 acres. The location and extent of significant structures and percent imperviousness, directions of storm water flow, locations of all existing structural control measures, the location of the receiving water in the immediate vicinity of the facility, and the locations of the vegetative swale and culverts, which are the only storm water conveyances at the site, are identified on Attachment B, Site Map.

In addition, locations of potential pollutant sources (e.g., storage areas and recycle bins); the location of the storm water monitoring station; inlet and outfall; and locations where industrial activities are exposed to precipitation (vehicle/equipment maintenance area for non-liquid repairs) are also identified on this map. There are no locations or sources of run-on to the site from adjacent property that contain significant quantities of pollutants.

### 2.0 Potential Pollutant Sources

### 2.1 Potential Pollutants Associated with Industrial Activity

Table 2.1-1 identifies specific industrial activities and associated pollutants at TA-54 MFW that are potentially exposed to storm water. The list of potential pollutants associated with the industrial activities includes all significant materials that have been handled, managed, or stored at the site.

Industrial Activity	Associated Pollutants
Equipment and vehicle maintenance	Chlorinated solvents, oil, hydraulic and transmission fluid, grease, heavy metals acid/alkaline wastes, ethylene glycol, fuel
Outdoor vehicle and equipment storage and parking	Oil, hydraulic fluid, heavy metals, fuel
Liquid and chemical storage	Oil, grease hydraulic and transmission fluid, heavy metals, fuel, paint, materials being stored, salt
Loading and unloading	Oil, grease hydraulic and transmission fluid, heavy metals, fuel, materials being stored
Waste storage	Oil, hydraulic and transmission fluid, heavy metals, fuel, scrap metal, trash, aerosol cans
Recycle bins	Oil and grease residues on metal for recycling

# Table 2.1-1 Potential Pollutants Associated with Industrial Activity

## 2.2 Spills and Leaks

A number of areas throughout TA-54 MFW have been identified as locations where the occurrence of a spill or leak could contribute pollutants to storm water discharges. These locations and the associated discharge points are described in Table 2.1-2.

Table 2.1-2 MFW Areas Where Potential Spills/Leaks Could Occur

Location	Discharge Points
Receiving/loading area on north side of the facility	Sheet flow northeastward towards the vegetated swale along the northern property boundary on north side of facility, into a culvert leading to Pajarito Canyon.
Used oil storage area on the southeast corner of the facility	Sheet flow south and eastward on-site into an earthen berm on the south and east sides of facility. This berm retains storm water on-site.
Vehicle/equipment maintenance and repair area on the concrete pad in the northwest corner of the facility	Sheet flow north and eastward into the swale on the north side of the facility, eastward into a culvert leading to Pajarito Canyon.

### Description of Past Spills/Leaks

While minor leaks of vehicle fluids from heavy equipment operations may have occurred as a result of normal operations at TA-54 MFW, N3B is unaware of any spills that discharged into a watercourse or canyon, or migrated from the site for the period of record under the 2015 MSGP. Minor spills or leaks, if

they occur, will be documented in accordance with N3B-AOP-TRU-3003, *Material Release or Spill* and RP-1-DP-16, *Responding to Radioactive Material Spills*, as appropriate.

#### 2.3 Unauthorized Non-Storm water Discharges Documentation

N3B is not aware of unauthorized non-storm water discharges associated with TA-54 MFW.

Non-authorized spills or unauthorized non-storm water discharges, if they occur, will be documented in accordance with corrective action documentation described in section 6.0 of this SWPPP.

### 2.4 Salt Storage

Deicing salt is stored in small covered containers at various locations around the facility to deice walkways and small areas. It is not stored in piles for large-scale road deicing.

### 2.5 Sampling Data Summary

Historical storm water discharge sampling, before 2018, storm water associated with the industrial activity at MFW was conducted by the previous LANL operator (i.e., LANS). Following transition of operation of this facility to N3B in 2018, storm water sampling planned by LANS was conducted by N3B. All of the storm water sampling results from MFW, including samples collected by LANS and N3B, are available in the LANL Environmental Information Management (IM) System.

TA-54 MFW is monitored by one sampler (monitored outfall 049) located near the northeastern corner of the site. The current sampler location is consistent with the location previously monitored by LANS. Although sampling at this location has been ongoing since approximately 2015 (before 2018 this sampling was performed by LANS), N3B has elected to re-initiate impairment sampling for all applicable parameters at outfall 049 in 2019. Benchmark sampling is not required for this outfall. Monitoring requirements applicable to this site are summarized in section 4.7 of this SWPPP.

### 3.0 Storm water Control Measures

### 3.1 Non-Numeric Technology-Based Effluent Limits (BPT/BAT/BCT)

TA-54 MFW personnel implement storm water control measures designed to ensure operator safety, environmental protection, and proper use and maintenance of loading/unloading and waste management equipment. N3B maintenance personnel perform routine preventive and corrective maintenance work to ensure industrial equipment is in good working order. The operational procedures incorporate provisions for corrective, predictive, and preventative maintenance. They also address appropriate adjustment and/or replacement of devices, equipment, and systems. This approach allows for identification and corrections of conditions that have the potential to cause breakdowns or failures that could result in the release of pollutants to the environment.

The following sections describe the storm water control measures installed at the TA-54 MFW to meet each of the permit's "non-numeric effluent limits" in Part 2.1.2 of the MSGP.

#### 3.1.1 Minimize Exposure

Structural controls and practices used to minimize the exposure of material storage areas and industrial activities to rain, snow, snowmelt, and runoff at the TA-54 MFW include the following:

- Maintenance activities are conducted indoors or under cover, when possible, or within a bermed area.
- Spill cleanup/response materials are readily available.
- Drip pans and/or secondary containment systems are placed under leaking or leak-prone equipment.
- Wet cleanup practices that would result in the discharge of pollutants to storm water drainage systems are prohibited.
- Prompt cleanup of releases with absorbent pads, biodegradable/bioremediation dry absorbents (Oil Sponge<sup>™</sup> or equal), or dispersant/bioremediation liquid product (e.g., MicroBlaze® for stains) is performed.
- Procedures for material storage and handling (spill control) are current and in place.
- Containers that could be susceptible to spillage or leakage are properly labeled to encourage proper handling and facilitate rapid spill response.
- Equipment and vehicles that are decommissioned or that will remain unused for an extended period are properly stored and fluids drained to prevent leaks.
- Equipment/vehicle repair and work areas are swept or vacuumed regularly.
- All dumpsters are covered or closed with lid when not in use.
- Lubricating fluids and cleaners are properly controlled.

- All liquid products are stored within a designated area under cover and within secondary containment. Used oil filters are stored in designated covered bins under cover and within secondary containment.
- Procedures that specify appropriate methods for handling wastes so that they are not exposed to storm water are implemented.
- Routine facility inspections (RFIs) and quarterly visual assessments (QVA) ensure that this SWPPP is properly followed and that no potential contaminants are present in exposed areas as addressed in section 4.6.1, Routine Facility Inspections and section 4.6.2, Quarterly Visual Assessment of Storm water Discharges.
- Leaking vehicles and equipment staged on-site for repair are parked on impervious surfaces and under cover.

#### 3.1.2 Good Housekeeping

All areas will be maintained in a clean and orderly state in accordance with good housekeeping practices that have been implemented to keep exposed areas of TA-54 MFW clean. These practices include the following:

- Outside areas are routinely cleaned up.
- Shop areas are swept daily when the facility is active.
- Operational areas are maintained in a clean and orderly state.
- Trash dumpsters are emptied on a regular basis and lids are kept closed when not in use.
- Only containers in good condition will be used on-site.
- Facility inspections are routinely conducted to ensure potential contaminants are not present in exposed areas.
- Heavy equipment is routinely inspected for leaks and potential problems.
- Measures are implemented to minimize storm water run-on/runoff to maintenance areas.
- Releases are immediately cleaned up with absorbent pads or biodegradable dry absorbents (Oil Sponge<sup>™</sup> or equal), or dispersant/bioremediation liquid product (e.g., MicroBlaze® for stains) on concrete or asphalt. Stained base course is removed, containerized and managed as New Mexico special waste (NMSW).
- Maintenance activities are conducted indoors or under cover, when possible.
- Sumps and catch basins are routinely cleaned of accumulated debris/sediment when they become two-thirds (2/3) full (the debris surface is maintained at least 6 in. below the lowest outlet pipe).
- All liquid products are stored within labeled containers in a designated area under cover and in secondary containment.
- Wet cleanup practices that would result in the discharge of pollutants to storm water drainage systems are prohibited.

• Wastes are managed and disposed in accordance with the appropriate procedures.

#### 3.1.3 Maintenance

At TA-54 MFW, preventive maintenance is performed on all heavy equipment on a routine schedule in accordance with appropriate procedures. Operators perform a pre-operation inspection on equipment before use. These inspections identify any maintenance issues or leaks that need to be remedied.

N3B CH-TRU personnel perform routine inspections to identify facility maintenance issues. CH-TRU personnel additionally maintain appropriate spill response materials within the Resource Conservation and Recovery Act- (RCRA-) permitted areas and vehicle/equipment maintenance areas.

Storm water control RFIs and QVAs are conducted by the storm water PPT to assess the site conditions and the functionality of site storm water controls. Each type of inspection is discussed in section 4.6 of this SWPPP.

Repair, maintenance, or replacement of BMPs will be conducted as soon as possible in accordance with the time frames specified in section 6.0 of this SWPPP. Documentation of repairs and maintenance to control measures will be maintained within this SWPPP.

### 3.1.4 Spill Prevention and Response

Operational controls are implemented to minimize the possibility of spills or releases caused by site operations and to minimize the potential for any off-site impacts in the event a spill does occur. In general, the approach to spill cleanup of a known substance is to first contain the spill by securing the spill source and deploying spill containment materials. If secondary containment is provided (e.g., secondary containment pallets for liquids), it will contain the spill. All spill response will be in accordance with N3B-AOP-TRU-3003, *Material Release or Spill* and RP-1-DP-16, *Responding to Radioactive Material Spills*, as appropriate.

The TA-54 Operations Center can be reached at 505-257-8400. If a fire or explosion is present, or if the potential for such exists, the situation must be reported by dialing 911 or by activating a fire pull box. Personnel should dial 911 in the event of an employee injury. In the event of a spill, the CH-TRU Operations Center will notify R&SI. Reporting, if necessary will be completed by R&SI in compliance with N3B and DOE policies and federal and state regulatory reporting requirements. In addition to fulfilling reporting requirements, spill reports will assist user groups and N3B management in assessing the cause of a spill and in executing corrective action.

There are potentially two types of spill reporting applicable to any spill situation, including (1) internal spill record keeping and (2) external agency notification. Copies of internal spill reports will be kept by R&SI. External agency notification (as determined by R&SI personnel) may consist of verbal or written notification to the National Response Center, EPA Region VI, the New Mexico Environment Department (NMED), or nearby Pueblos, as appropriate.

#### 3.1.5 Erosion and Sediment Controls

Physical controls are in place throughout the site to minimize erosion and to manage sediment and storm water runoff from the site. Storm water controls, illustrated on the site map provided in Attachment B, include vegetative swales, culverts, and earthen berms.

#### 3.1.6 Management of Runoff

The areas bordering the impervious surfaces at the TA-54 MFW are stabilized with established native vegetation. This vegetative buffer holds soil in place, increases infiltration, and retards and filters runoff. An earthen berm is present on the south and east sides. A vegetated swale on the north side of TA-54 MFW directs storm water runoff away from the facility.

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

Deicing salt is stored in covered containers in close proximity to buildings, walkways, and areas prone to ice.

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

The controls implemented at the TA-54 MFW to minimize the generation of dust and off-site tracking of raw, final, or waste materials debris includes the following:

- Parking vehicles and equipment on impervious surfaces
- Minimizing off-road travel
- Covering the areas surrounding the TA-54 MFW with base course
- Stabilizing the areas bordering the base course with established native vegetation

#### 3.2 Sector-Specific Non-Numeric Effluent Limits

MSGP Sector P technology-based effluent limits applicable to MFW include the use of good housekeeping measures and employee training relevant to vehicle and equipment storage and maintenance and material storage areas. These requirements have been incorporated into this SWPPP.

#### 3.3 Numeric Effluent Limitations Based on Effluent Limitations Guidelines

The operations conducted at TA-54 MFW do not include regulated activities subject to effluent limitations guidelines identified in the 2015 MSGP Part 6.2.2.1

#### 3.4 Water Quality-based Effluent Limitations and Water Quality Standards

Based on receiving water impairments identified by NMED in the 2018 State of New Mexico 303(d) List of Impaired Surface Waters, sampling of storm water discharges associated with this industrial site will be analyzed for total recoverable aluminum, PCBs, dissolved copper, adjusted gross alpha, and total recoverable cyanide. All available storm water data collected from this site is maintained in the EIM System.

## 4.0 Schedules and Procedures

Pick-up and disposal of regulated wastes is scheduled and tracked by CH-TRU using an internal waste compliance and tracking system (WCATS). Trash generated and stored on-site in a dumpster is removed from the site at least monthly.

Waste inspections are scheduled and conducted based on the type of waste accumulation area where the waste is managed. These inspections include visual checks for leaks and condition of containers, tanks, and packaging.

### 4.1 Good Housekeeping

Good housekeeping practices are incorporated into all MFW operations. All areas are maintained in a clean and orderly state and inspected regularly to document site conditions. Standard operating and maintenance procedures are designed to minimize the potential for spills, releases, exposure of materials, or any other events that could adversely affect the quality of storm water that may be transported out of the area by runoff.

Good housekeeping practices implemented throughout MFW are summarized in section 3.0 of this SWPPP.

### 4.2 Maintenance

All industrial equipment will be regularly inspected (e.g., preventative maintenance, and before use), tested, maintained, and repaired to minimize leaks, spills, and other releases of pollutants.

All control measures used to achieve effluent limits required by the MSGP will be maintained in effective operating condition. Nonstructural control measures must also be diligently maintained (e.g., spill response supplies and appropriately trained personnel).

If control measures need to be replaced or repaired, necessary repairs or modifications must be made as expeditiously as practicable.

All corrective actions will be documented in the N3B MSGP Storm Water database. This database will be used to track the status of corrective actions and for reporting purposes.

N3B CH-TRU maintains a list of all N3B-owned or -controlled equipment. This list identifies when equipment is due for preventative maintenance or inspection. Heavy equipment and vehicle maintenance and inspections are tracked by CH-TRU.

Normal maintenance of control measures will be conducted as soon as possible in order to minimize the potential for pollutant discharges. These normal maintenance measures will be considered preventative maintenance and will not be recorded as corrective actions, although each preventative maintenance measure taken will be documented and tracked in the MainConn storm water database and included in the annual MSGP report, as appropriate. In the event that a control requires significant repair or replacement, this action will be recorded as a corrective action.

### 4.3 Spill Prevention and Response Procedures

Spills or releases are minimized by the application of exposure minimization and good housekeeping procedures, BMPs, and engineering and administrative controls.

Examples of spill prevention measures include the following:

- Storage of all liquid products within labeled containers in a designated area under cover and within secondary containment for preventing spills that can contaminate storm water
- Placement of drip pans and/or secondary containment systems under leaking or leak-prone equipment
- Prompt cleanup of releases with absorbent pads or biodegradable/bioremediation dry absorbents (Oil Sponge<sup>™</sup> or equal), or dispersant/bioremediation liquid product (e.g., MicroBlaze® for stains on concrete and asphalt). Stained base course must be picked up and managed as NMSW.
- Appropriate spill cleanup/response materials are readily available.
- Spill response at MFW will be directed by N3B-AWMOOP-TRU-3003, *Material Release or Spill* and RP-1-DP-16, *Responding to Radioactive Material Spills*, as appropriate.

#### 4.4 Erosion and Sediment Control

The areas surrounding the TA-54 MFW, including material and waste storage locations, are covered with structures, concrete, and base course.

The areas surrounding TA-54 MFW are stabilized with established native vegetation. A vegetated swale on the north side of TA-54 MFW directs storm water runoff away from the facility.

#### 4.5 Employee Training

Employee training is essential for effective implementation and maintenance of this SWPPP. The objective of the training program is to cover all required training topics identified in the 2015 MSGP, review the most current SWPPP with employees and managers, help employees recognize situations that could lead to storm water contamination, assist employees in recognizing issues that may require corrective action and identifying appropriate corrective actions, and train personnel in proper spill response and control procedures.

All employees who work in areas where industrial materials or activities are exposed to storm water or who are responsible for implementing activities necessary to meet the conditions of the 2015 MSGP will receive training annually. This includes all operational site workers, managers, and supervisors at TA-54, and all storm water PPT members. Annual employee training ensures that personnel are aware of the regulatory requirements of the 2015 MSGP, monitoring results, control measures, and some components of the SWPPP. After training, the employees are able to recognize and avoid situations that could lead to storm water contamination, prevent spills and releases, and respond safely and effectively to a spill or release.

The TA-54 MSGP training includes an annual MSGP training slide presentation and a review of this SWPPP to address the following topics:

- Specific control measures used on-site
- Storm water monitoring results
- Inspections
- Planning

- Reporting
- Spill prevention, response, and cleanup
- Good housekeeping and material management practices to prevent storm water pollution
- Site-specific structures, equipment, and procedures designed to minimize storm water pollution and soil erosion
- Documentation requirements
- Recognition of pollutant sources
- Endangered species and cultural/historic awareness

Training activities are documented and maintained in accordance with N3B's Training Organization.

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

Two types of inspections are required by the 2015 MSGP permit, including (1) RFIs and (2) QVAs of storm water discharges at TA-54 MFW.

#### 4.6.1 Routine Facility Inspections

RFIs will be conducted on a quarterly basis by the PPT lead or designee. Each RFI inspection will include all facility areas where industrial materials or activities are exposed to storm water, as well as storm water control measures.

The SWPPP team member performing the inspection will use the RFI work statement provided in Attachment D of this SWPPP to document each inspection. The completed forms will be signed by an authorized representative and become a quality record in Attachment D of this plan.

One RFI per year must be conducted during a period when a storm water discharge is occurring.

RFIs will record and evaluate the following, at a minimum:

- Inspection date and time
- Name(s) and signature(s) of inspector(s)
- Weather information and a description of any discharge(s) occurring at the time of the inspection
- Any previously unidentified discharges of pollutants from the site
- Any control measures needing maintenance or repairs
- Any failed control measures that need replacement
- Any discharges occurring at the time of the inspection
- Any unidentified discharges and/or pollutants from the site
- Any evidence of, or potential for, pollutants entering the drainage system
- Observations regarding the condition of the outfalls
- Any additional control measures needed to comply with the MSGP

Specific areas of the facility to be inspected include:

- Storage areas for vehicles/equipment awaiting maintenance
- Indoor and outdoor vehicle/equipment maintenance areas
- Material storage areas
- Vehicle/equipment cleaning areas
- Loading/unloading areas
- Used oil storage area
- Waste storage area (e.g., solid waste dumpster)

NOTE: All documentation shall be included in this SWPPP.

RFIs occur on the following schedule for each calendar year (CY):

	CY RFI	Schedu	le
Q1	January 1		March 31
Q2	April 1	-	June 30
Q3	July 1	·	September 30
Q4	October 1	April 10	December 31

Any required corrective actions identified during the inspection will be addressed in accordance with N3B-ENV-RCRA-QP-022, *MSGP Quarterly Facility Inspection and Corrective Actions*.

#### 4.6.2 Quarterly Visual Assessment of Storm water Discharges

The QVAs are conducted at the single outfall for TA-54 MFW by qualified CH-TRU personnel and documented using a blank QVA work statement.

Each QVA will:

- Be conducted on a representative sample of a measurable discharge
- Use a clean clear glass sample container in a well-lit area
- Be collected in the first 30 min of a discharge from a storm event or will document why it could not be collected during the specified period (adverse conditions, snowmelt, etc.)
- Be conducted at least 72 hr since the last storm event or will document why it was collected sooner
- Include documentation of rationale if a visual assessment is unable to be collected in a quarter (no precipitation event or adverse conditions)
- Perform an additional assessment during the next qualifying storm event if unable to perform it in a particular quarter

NOTE: All documentation shall be included in this SWPPP.

Collection of QVAs occurs on the following schedule for each CY in accordance with N3B-QP-RGC-0004, *MSGP Storm water Visual Assessments*:

CY Quarterl	y Visual	Assessments
April 1	_	May 31
June 1		July 31
August 1		September 30
October 1		November 30

The visual assessment will evaluate storm water for the following water quality characteristics:

- color
- odor
- clarity
- floating solids
- settled solids
- suspended solids
- foam
- oil sheen
- other (i.e., obvious indicators of storm water pollution)

Individual(s) performing a visual assessment will document potential storm water pollution problems observed using the QVA form in accordance with N3B-QP-RGC-0004 MSGP *Storm water Visual Assessments*.

Required corrective actions identified during the assessment will be addressed in accordance with Part 4 of the 2015 MSGP and N3B-ENV-RCRA-QP-022, *MSGP Storm Water Corrective Actions*. The results of the QVAs are to be included in Attachment E of this SWPPP.

### 4.7 Monitoring

Monitoring activities applicable to TA-54 MFW include:

• Impaired waters monitoring and QVAs

Note: There are no quarterly benchmarks for Sector P.

Located at the northeast corner of the TA-54 MFW discharge point 049, sampling is performed at automated sampler MSGP04901 for impaired waters and QVAs.

Quarterly and impaired water storm water monitoring begin at this facility by former operator, LANS, in 2015. Impaired water constituents associated with the Pajarito Canyon are PCBs, total recoverable aluminum, adjusted gross alpha, dissolved copper, and total recoverable cyanide (Table 4.7-1). Impaired water quality data collected in accordance with the 2015 MSGP is maintained in EIM. There are no substantially identical outfalls associated with the TA-54 MFW.

Monitoring Requirement	Industrial Sector	Assessment Unit	Analyte	Filtered/ Unfiltered	Regulatory Standard	Units	Regulatory Standard Reference
Impaired Waters		NM-128.A_08	Aluminum (total recoverable)	F the second second	660	µg/L	20.6.4.900 NMAC Subpart I
Impaired Waters		NM-128.A_08	PCBS	UF	0.00064	µg/L	20.6.4.900 NMAC Subpart J/ 20.6.4.12 NMAC Subpart E
Impaired Waters		NM-128.A_08	Copper (dissolved)	F	20.8	µg/L	20.6.4.900 NMAC Subpart I
Impaired Waters	Bouldered A	NM-128.A_08	Gross Alpha (adjusted)	UF	15	pCi/L	20.6.4.900 NMAC Subpart J
Impaired Waters		NM-128.A_08	Cyanide (total recoverable)	UF	5.2	µg/L	20.6.4.900 NMAC Subpart J
Quarterly Benchmark	Р						

Table 4.7-1Control Values – Outfall 049 (54-MFW-1)

## 5.0 Documentation to Support Eligibility Considerations Under Other Federal Laws

#### 5.1 Documentation Regarding Endangered Species

The LANL "Threatened and Endangered Species Habitat Management Plan for Los Alamos National Laboratory" (HMP) (<u>https://permalink.lanl.gov/object/tr?what=info:lanl-repo/lareport/LA-UR-15-28610</u>) was prepared to provide for the protection of federally listed threatened and endangered species and their habitats at LANL. The HMP was designed to be a comprehensive landscape-scale management plan that balances the current operations and future development needs of LANL with the habitat requirements of threatened and endangered species. It also facilitates DOE compliance with the Endangered Species Act and related federal regulations. The HMP received concurrence from the U.S. Fish and Wildlife Service (USFWS), and was first implemented in 1999. All changes to the HMP, such as adding new species or changing requirements, are assessed in a new consultation with the USFWS before being implemented. The HMP provides guidance by species for different types of activities allowed without further review by the USFWS.

Currently, the only federally listed species that have habitat or occur at LANL are the Southwestern Willow Flycatcher (*Empidonax trailii extimus*), Jemez Mountains Salamander (*Plethodon neomexicanus*), and Mexican Spotted Owl (*Strix occidentalis lucida*). Suitable habitats for these species, along with a protective buffer area surrounding the habitats, have been designated as areas of environmental interest (AEIs). An AEI consists of a core area that contains important breeding or wintering habitat for a specific species and a buffer area around the core area. The buffer protects the core area from disturbances that would degrade the value of the core area to the species.

The HMP includes ecorisk analyses that account for any industrial facility's storm water discharges, allowable non-storm water discharges, and storm water discharge-related activities. In addition, the LANL site-wide environmental impact statement (SWEIS) biological assessment covered the continuation of LANL operations and included outfalls (https://www.energy.gov/nepa/downloads/eis-0380-final-site-wide-environmental-impact-statement).

As determined by earlier evaluations, storm water discharges, allowable non-storm water discharges, and storm water discharge-related activities from LANL MSGP locations are not likely to adversely affect any species that is federally listed as endangered or threatened under Criterion D Section iii of the Endangered Species Act. These activities will not result in the adverse modification or destruction of habitat that is federally designated as "critical habitat" under the Endangered Species Act. New activities are evaluated to determine if they will have an impact to any species. If an activity can be completed within the guidelines of the HMP, it can go forward as scheduled; however, if the activity cannot comply with the guidelines, the HMP requires that a project-specific biological assessment be prepared for the action and go through the consultation process with the USFWS.

New Mexico waters of the state and watersheds harbor endangered and threatened species and their critical habitat. The LANL SWEIS excerpt Map 5-1 shows the locations of endangered species and their associated waters of the state and watersheds. Although there are no areas of designated critical habitat or threatened species on the MFW map (Attachment B, *Site Map*), the storm water runoff may affect endangered species downstream from TA-54 as illustrated by Figure 5.1-1.





Figure 5.1-1 Endangered species habitat within LANL

#### 5.2 Documentation Regarding Historic Properties

In August 2015 and December 2008, the LANS Cultural Resources Team (using GPS spatial data as well as conducting visual inspections), reviewed the LANL industrial sites and their associated outfalls and monitoring stations subject to the 2015 MSGP (Permit #NMR050000) for effects on historic properties.

TA-54 MFW was found to pose no effect and to be in compliance with Section 106 of the National Historic Preservation Act. No significant changes are known to have occurred to the TA-54 MFW site since this review by LANS.

### 6.0 Corrective Actions and Deadlines

#### 6.1 Immediate Actions

Upon discovery/occurrence or at most within 24 hr of discovery, any of the following conditions must be documented in N3B's MSGP Storm water database. As necessary, initiation of corrective action will be triggered and tracked for completion.

- An unauthorized release or discharge (e.g., spill, leak, or discharge of non-storm water not authorized by this or other NPDES permit) occurs at the facility
- Control measures are determined to be insufficient to meet applicable water quality standards, not functional or requiring maintenance
- An inspection or evaluation of the facility determines that modifications to the control measures are necessary to meet the non-numeric effluent limits in this permit
- A determination that a control measure was never installed, was installed incorrectly or not in accordance with the 2015 MSGP, or is not properly operated or maintained
- Construction or a change in design, operation, or maintenance at the facility that significantly changes the nature of pollutants discharged in storm water, 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, triggering this review

**Note:** A benchmark exceedance does not trigger a corrective action if it is determined that the exceedance is solely attributable to natural background sources, or if it is determined that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice.

Routine maintenance requirements noted during inspections will be entered in the N3B MSGP Storm water database for tracking and reporting purposes, as appropriate. Required maintenance, however, will not be considered or recorded as corrective actions unless the functionality of a storm water control is compromised by the noted condition.

#### 6.2 Subsequent Actions/Documentation

All conditions subject to corrective action will be documented in the N3B MSGP Storm water database upon discovery/occurrence. While attempts will be made to immediately address each condition subject to corrective action, investigation or correction of the condition is required within 14 days of discovery. In some instances, it may be infeasible to complete the corrective action within this time frame, in which case the situation will be documented along with details to describe how the potential impacts from the condition will be minimized (such as the installation of temporary controls, etc.) and additional time required to complete the corrective action. If completion of the corrective action exceeds 45 days from the date of discovery/occurrence, R&SI will notify EPA Region 6.

All modifications, including temporary measures, must be incorporated into this SWPPP.

### 7.0 SWPPP 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 information submitted.

Based on my inquiry of the person(s) who manage the system, or person(s) directly responsible for information gathering, the information received is to the best of my knowledge true, accurate, and complete.

I understand and acknowledge the implications and penalties for submitting false information, including the possibility of a fine and/or imprisonment.

#### SIGNATURE OF CERTIFICATION:

Printed Name:

Frazer Lockhart

Much Konthink

N3B Program Manager, Regulatory & Stakeholder Title: Interface

2019 Date:

Signature:

## 8.0 SWPPP Modifications

Modifications to this SWPPP will be made as necessary to reflect corrective actions or facility changes. Modifications to this document can be initiated by any storm water PPT member with review provided by R&SI and approval provided in accordance with the signatory requirements specified in the 2015 MSGP. A record of all document modifications will be tracked using the form provided in Attachment F.



Attachment B Site Map





Number	Title
N3B EPC-CP-QP-064	MSGP Storm Water Visual Inspections
N3B-AOP-TRU-3003	Material Release or Spill
RP-1-DP-16	Responding to Radioactive Material Spills
N3B-SOP-ER05016	Multi-Sector General Permit Storm Water Corrective Actions
N3B-ENV-RCRA-QP-022	MSGP Storm Water Corrective Actions
N3B ENV-CP-QAPP-MSGP R5	Storm Water Multi-Sector General Permit for Industrial Activities Program
N3B-SOP-ER-4004	Installing, Setting Up, and Operating Automated Surface Water Samplers
N3B-SOP-ER-5004	Installation and Maintenance of Remote Telemetry Units for Surface Water Projects

## Attachment C Relevant Procedures

Attachment D Routine Facility Inspections Form and Reports



#### Work Order MSGP-72672

MSGP Monitoring Stations Printed 3/15/2019 - 2:45 PM (Duplicate Copy)

Requested: Procedure:	2/22/2019 9:29:06 AM MSGP Stormwater Industrial Routine Facility	Target: Priority/Type:	3/31/2019 / Preventive	24 MSGP TA 54 - 括 RG249.5 - <b>社 TA-54 MFW</b>	
Last PM: Project:	Form) 12/13/2018 2019 Routine Facility Inspections (P-MSGP- 5921)			Contact: Phone:	
Reason: M	ISGP Stormwater Industrial	Routine Facility	Inspection		

Tasks

#	Description	Meas.	No	Yes
WEAT	THER INFORMATION			
20	Describe the weather at time of inspection in the task comment. Document the temperature (F°) in the "Reading" field of this line.	******	Г	Г
Nithi	n the Facility Boundary			
40	Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "No", describe:	*******	Г	Г
50	If "No" has a CAR been previously initiated for this new discharge? (Range: 0 - 0)		<u> </u>	
80	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe:		Г	Г
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe:		Г	Г
Outfa descr	Il Inspection needed maintenance and repairs, failed control measures that need r iption of corrective actions in relevant task comment)	eplaceme	ent, or a	L
90	Monitored Outfall [049] Free of evidence of erosion? (Range: 0 - 0)		Г	Г
100	Monitored Outfall [049] Flow Dissipation Devices Operating Effectively? (Range: 0 - 0)		Г	
110	Monitored Outfall [049] Free of evidence of pollutants in Discharges and/or Receiving Water? (Range: 0 - 0)		Г	П
Contr or a d	ol Measures (identify needed maintenance and repairs, failed control measures th	at need re	eplacen	nent,
130	Earthen Berm [5400403010002] Is control measure operating effectively? If "No" describe condition and need for maintenance, repair, or replacement.		Г	Г
140	Earthen Berm [5400403010003] Is control measure operating effectively? If "No" describe condition and need for maintenance, repair, or replacement.	*****	T	Г
150	Jersey Barriers [5400403170004] Is control measure operating effectively? If "No" describe condition and need for maintenance, repair, or replacement.		Г	Г
160	Vegetated Swale [5400404070001] Is control measure operating effectively? If "No" describe condition and need for maintenance, repair, or replacement.	400000000000000000000000000000000000000	Г	Г
Area/.	Activity exposed to stormwater (identify needed maintenance or a description of c	orrective	actions	s in
180	Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	Г
190			Г	Г

	Produce/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe,			
200	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.	**************************************	Б	Г
210	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		П	Г
220	Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	Г
230	Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe.			Г
240	Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		П	Г
250	Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe.		<u> </u>	
260	Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	Г
270	Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe.			Г
280	Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	Г
290	Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	Г
300	Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	Г
310	Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe.	10000000000000000000000000000000000000		Г
320	Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe.		Г	Г
330	Sector P [54004-P] Vehicle storage/maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		F	Г
Non-C	Compliance			
350	Free of incidents of observed non-compliance not associated with any of the above? If "No" describe. (Range: 0 - 0)		Г	Г
Additi	ional Controls			
370	Are permit requirements satisfied with existing control measure(s)? If "No: describe additional control measure(s) needed. (Range: 0 - 0)		Г	
A				
abor	Report			
Comm	lated			
Comp				
Repo	rt:			
******				
Repor	rt:			

#### **Certification Statement of Authorization**

"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 managed 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 or imprisonment for knowing violations."

Name of Delegated Official of Permittees: Frazer Lockhart \_\_\_\_\_ Z#: \_\_\_\_\_

Date: Date on file Delegated Official Signature: Signature on File

Attachment E Quarterly Visual Inspection Form and Reports

# N3B MSGP Stormwater Visual Assessment Form For Use with N3B-PXXX, R0

Instruction for filling out	this form: This fo	orm is to b	e filled out in acc	ordance with N3B	-PXXX - Procedure Title .
All fields are required to b	e completed. Ide	entify prob	able sources of a	ny observed storn	nwater contamination.
Include any additional cor	nments, descript	ions, and a	iny corrective act	ions necessary. Or	nce complete, please send
to the R&SI-Compliance D	irector for evalua	ition and p	processing. If ther	e are any question	is regarding this form,
Quitfall ID					<u>an an a</u>
Field Inspector Name	(printed)				
Field Inspector Name (	princeu)		<u>.</u>	<u></u>	
Field Inspector M2P ID	/7 number				
Other staff present	/2 пипьег	1			
Other Stan present		Samul	aInformation	<u></u>	
Monitoring Doriod	<u> </u>	Janihi	e momation.		
Discharge Bogan	Data		Time	Duratia	
Natura of Discharge				Other	<b>1</b>
Description	<u>Ynam</u>	13110 00		Fuent Total Inches	
Sample Collection	Data		Time		,
Collected first 20 minu	itos of discharg	202	Vec		1
lf No. doscribo		501	100		<u>. 1</u>
Date Viewally Assessed	Data		Time		
Date Visually Assessed			<u></u>		
Description		Sampl	o Accoccmont		
Color	Ves	Jampi	e Assessment		
Description	1 185	<u>. 1</u>			
Odor	Ves		No		
Description	1 185		140		
Clarity	1 Vac		No	<u>en en en en en en el</u> . Tradicio de la companya de la company	
Dereviation	1 165				
Eleating Solids	Vec		No		
	<u>res</u>				
Description	1				
	Yes				
Uescription			•		
Suspended Solids	Yes		NO		
Foam' (gently snake)	Yes		No		
Description					
Oli Sneen*	Yes		No		
Description	• • •		gen e <sup>de</sup> la sectión de la contraction Contraction de la contraction de la cont		
Uther Indicators (desc	ription)			<u>e na skriže skoleta.</u> Marije	
Notes					

\* If any foam or oil sheen is observsed, notify supervisor and R & SI Regulatory Compliance Director IMMEDIATELY

N3B-PXXX, RO

# DRAFT

# N3B MSGP Stormwater Visual Assessment Form For Use with N3B-PXXX, R0

Certification and Signature

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 penalities for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name

Signature & Date

R&SI Use Only		
DB Input Date	Notification	
DB Input Initials	Notification Date	
N3B-PXXX, RO		Page 2

### Attachment F SWPPP Modifications

Name And Number	Date of Revision	History of Revision

# Attachment G Reference Documents



Date: JAN 1 6 2019

N3B-19-0016

Charles Maguire U.S. Environmental Protection Agency Region 6 Water Division Director 1445 Ross Avenue, Suite 1200 Dallas, TX 75202-2733

#### Subject: Delegation of Authorized Representative for the Clean Water Act and National Pollutant Discharge Elimination System Individual Permit

#### Dear Mr. Maguire:

The purpose of this letter is to inform the U.S. Environmental Protection Agency (EPA) Region 6 of the signatory authority for operations performed at Los Alamos National Laboratory (LANL) by Newport News Nuclear BWXT – Los Alamos, LLC (N3B). This letter delegates authority of the N3B authorized representatives for certifying and signing permit applications (e.g., notices of intent and notices of termination), permit modifications, registrations, certifications, reports, and other documents required under the Clean Water Act and the associated LANL National Pollutant Discharge Elimination System (NPDES) Individual Permit (Permit No. NM0030759).

I, Glenn Morgan, the Program Manager of N3B, hereby delegate authority to the following authorized representatives to execute on behalf of N3B permit applications, permit modifications, authorizations, certifications, reports, discharge monitoring reports, or other documents required by the EPA:

- Frazer R. Lockhart, Regulatory and Stakeholder Interface Program Manager
- Erich Evered, Environmental Remediation (ER) Program Manager
- Michael Erickson, Resource Conservation and Recovery Act Remediation Program Director

The following positions are hereby designated as authorized representatives to sign reports, plans, inspection certifications, and notices of changed conditions as required by the EPA:

#### NPDES Storm Water Construction General Permit

- Regulatory Compliance Director
- Regulatory Compliance Environmental Professional
- Cognizant Project Manager, Project Leader, Project Engineer, or Operations Manager for the regulated construction activity
- ER Environmental Professional

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#### Multi-Sector General Permit (Permit No. NMR050011 and NMR050012)

- ER Individual Permit Storm Water Corrective Actions Manager
- ER Individual Permit Storm Water Field Lead
- Regulatory Compliance Director
- Regulatory Compliance Environmental Professional
- Responsible Facility Operations Director or Operations Manager for the regulated facility or activity

#### LANL NPDES Individual Permit (Permit No. NM0030759)

- ER Water Program Director
- ER Monitoring and Compliance Program Manager
- ER Individual Permit Storm Water Corrective Actions Manager

If you have any questions, please contact Christian Maupin at (505) 695-4281 (christian.maupin@emla.doe.gov).

Sincerely,

Glenn Morgan /

Program Manager

cc: (date-stamped letter emailed) Arturo Duran, EM-LA Doug Hintze, EM-LA David Rhodes, EM-LA Cheryl Rodriguez, EM-LA Michael Alexander, N3B Donald Carlson, N3B Emily Day, N3B Mike Erickson, N3B Erich Evered, N3B Joseph Legare, N3B Frazer Lockhart, N3B Christian Maupin, N3B Jeremiah McLaughlin, N3B Glenn Morgan, N3B William O'Neill, N3B Bruce Robinson, N3B Troy Thompson, N3B Steve Veenis, N3B Jennifer von Rohr, N3B emla.docs@em.doe.gov N3B Records PRS Website



and the second sec

NPDES FORM 6100-28	\$epa	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460 ANNUAL REPORT FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMIT	FORM Approved OMB No. 2040-0004
Permit Information			
Report Year: 2018			
NPDES ID: NNR050011			
Facility Information			
Facility Name: TA54 MAINT	ENANCE FACILITY WEST		
Facility Point of	Contact		
First Name Middle Initial	Last Name: Glenn Morgar	1	
Organization: Title:			
Phone: 505-661-5918		Ext.	
Email: glenn.morgan@em-la.	dce.gov		
Facility Mailing	Address		
Address Line 1: 600 SIXIH	STREET		
Address Line 2:		City: LOS ALAMOS	
ZIP/Postal Code: 87544		State: NM	
County or Similar Division	: LOS ALAMOS		

#### General Findings

Provide a summary of your past year's routine facility inspection documentation (see Part 3.1.2 of the permit). In addition, if you are an operator of an airport facility (Sector S) that is subject to the airport effluent limitations guidelines, and are complying with the MSGP Part 8.S.8.1 effluent limitation through the use of non-urea-containing decers, provide a statement certifying that you do not use pavement deicers containing urea (e.g., "Urea was not used at [name of airport] for pavement decing in the past year and will also not be used in 2015." (Note: Operators of airport facilities that are complying with Part 8.S.8.1 by meeting the numeric effluent limitation for ammonia do not need to include this statement.)

Under the national Pollutant discharge elimination system (NPDES) ID NMR050011, Newport News Nuclear BWXT - Los Alamos, LLC (N3B) operates one active industrial site at Los Alamos National Laboratory: TA-54 Maintenance Facility West (MFW). This site was inspected in accordance with the routine facility inspection schedule specified in the site-specific Storm Water Pollution Prevention Plan (SWPPP) beginn ing with fiscal year (FY) 2018 Quarter 2 (Q2), following transition of operations of this facility from Los Alamos National Security, LLC (LAN S) to N3B on April 30, 2018. During Q2 through Q4, three routine facility inspections were conducted at this facility resulting in seven corrective actions. All of the corrective actions initiated from 2018 routine facility inspections are completed.

Provide a summary of your past year's quarterly visual assessment documentation (see Part 3.2.2 of the permit).

During the monitored period of 2018 (Q2-Q4), N3B conducted one visual assessment at MFW (outfall 049). No evidence of oil sheen or oth er indications of pollutants were noted and no need for corrective action was identified as a result of the visual assessment conducted.

For any four-sample (minimum) average benchmark monitoring exceedance, if after reviewing the selection, design, installation, and implementation of your control measures and considering whether any modifications are necessary to meet the effluent limits in the permit, you determine that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice, provide your rationale for why you believe no further reductions are achievable (see Part 6.2.1.2 of the permit). Enter "NA" if not applicable.

NA, quarterly benchmarks are not applicable to MFW as a Sector P site.

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

The combined results of routine facility inspections, visual assessments, and impairment sampling generated eight corrective actions cond ucted at three monitored or inspected outfalls or best management practices/ controls. All corrective actions initiated during 2018 Multi-Se ctor General Permit (MSGP) monitoring were completed before 45 days following discovery.

Certification Information

#### Data Entry User

Data Entry User: Emily Gorman Entered On: 04/01/2019 1:55 PM

#### **Proxy Certifier**

I certify that all information accurately represents the information submitted on the paper version of the form to the best of my knowledge.

Data Entry User: Emily Gorman Certified On: 04/01/2019 2:12 PM

#### Paper Form Certifier

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 property 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.

Certified By: Genn Morgan Certifier Title: Acting President Certifier Email: glenn.morgan@em-la.doe.gov Certified On: 01/29/1029

#### Copies of the paper form:

Name	Created Date	Size
NVR050011_TA-54 Maintenance Facility West_02-07-2019.pdf	04/01/2019 2:12 PM	149.69 KB

	FED U / 2019		
NPDES FORM 6100-28	<b>\$EPA</b>	United States Environmental Protection Agency Washington, DC 20460 Annual Report for Stormwater Discharges Associated w Industrial Activity under the NPDES the NPDES Multi-Sector Gen	Form Approv TH By OMB No 2040- SERAL PERMIT
A. Approval to	Use Paper Annual Report (	Form	
1. Have you been	granted a waiver from elect	ranic reparting from the EPA Regional Office*? 🛛 YES 🔽 NO 🕴	
If yes, check wh approval:	ich waiver you have been gr	ranted, the name of the EPA Regional Office staff person who grante	d the waiver, and the date of
Waiver grai	nted:  The owner/ope identified as un Commission.	erator's headquarters is physically located in a geographic area (i.e., ider-served for broadband internet access in the most recent report ${\bf f}$	ZIP code or census tract) that is ram the Federal Communication
	The owner/ope	erator has issues regarding available computer access or computer c	apability.
Name of EP waiver	A staff person that granted t	ne	
Date appro	vot		
* Note: You are re a waiver, you mu: eNOI-System-for-	quired to obtain approval fro It file this form electronically u FPAs-MultiSector-General-Per	m the applicable EPA Regional Office prior to using this paper annual using the NPDES eReporting Tool (NeT) at <u>http://water.epa.gov/polwas</u> milt.ctm	report form. If you have not oble ste/nodes/stormwater/Stormwater
B. Permit Inform	ation		
1. NPDES ID:	NMR05003		
C. Facility Inform	nation		
1. Facility Name:	TA-54 Mair	ntenance Facility West	
2. Facility Phone:	505-661-59	9 1 8 Ext.	
3. Facility Mailing	Address:		
Street:	600 Sixth	Street	
City:	LOSAIAMOS	state: NM C	ZIP a 7 5 4 4 •
County or Similar (	Sovernment Subdivision:	os Alamos County	
4. Point of Contac	t:		
First Name, Middle	e Initial, Last Name: G	1 e n n Morgan	
D. General Find	ings		
In reviae a summ airport facility (see the use of non-ure [name of airport] f 8.5.8.1 by meeting Under the I News Nucl National La accordance Pollution Pi transition o April 30, 20 facility resu	tory or your part years routhin ctor s) that is subject to the al- a-containing delcers, provid- or pavement delcing in the p the numeric effluent limitation National Pollutant I ear BWXT – Los A aboratory: TA-54 M with the routine far revention Plan (SW f operations of this 18. During Q2 through thing in seven corre-	Proceeding inspection accumentation (see rart 3.1.2 of the permit). In a Import effluent limitations guidelines, and are complying with the MSGP e a statement certifying that you do not use payement delicers contail hast year and will also not be used in 2015." (Note: Operators of alroor on for ammonia do not need to include this statement.) Discharge Elimination System (NPDES) ID N lamos, LLC (N3B) operates one active indus laintenance Facility West (MFW). This site w acility inspection schedule specified in the site VPPP) beginning with fiscal year (FY) 2018 C facility from Los Alamos National Security, L bugh Q4, three routine facility inspections we pactive actions. All of the corrective actions ini-	Part 5.5.8.1 effluent limitation the ining area (e.g., "Urea was not a tracilities that are complying with IMR050011, Newporr strial site at Los Alam as inspected in e-specific Storm Wa Quarter 2 (Q2), follow LC (LANS) to N3B ( are conducted at this initiated from 2018)

2. Provide a summary of your past year's quarterly visual assessment documentation (see Part 3.2.2 of the permit).

During the monitored period of 2018 (Q2–Q4), N3B conducted one visual assessment at MFW (outfall 049). No evidence of oil sheen or other indications of pollutants were noted and no need for corrective action was identified as a result of the visual assessment conducted.

3. For any four-sample (minimum) average benchmark monitoring exceedance, if after reviewing the selection, design, installation, and implementation of your control measures and considering whether any modifications are necessary to meet the efficient limits in the permit, you determine that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice, provide your rationale for why you believe no further reductions are achievable (see Part 6.2.1.2 of the permit). Enter "NA" if not applicable.

NA, quarterly benchmarks are not applicable to MFW as a Sector P site.

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

The combined results of routine facility inspections, visual assessments, and impairment sampling generated eight corrective actions conducted at three monitored or inspected outfalls or best management practices/controls. All corrective actions initiated during 2018 Multi-Sector General Permit (MSGP) monitoring were completed before 45 days following discovery.

E. Certification Information		
I certify under designed to a who manage and belief, tru- and imprisonm	penalty of law that this document and all attachments were prepared under my direct issure that qualified personnel property gathered and evaluated the information submit the system, or those persons directly responsible for gathering the information, the infor- e, accurate, and complete. I am aware that there are significant penalties for submittin nent for knowing violations.	lion or supervision in accordance with a system led. Based on my inquiry of the person or persons mation submitted is, to the best of my knowledge ng false information, including the possibility of fine
First Name, Mi	ddie Initiai, Last Name: G 1 e n n M a r g	a n l l l l l l l l l l l l l l l l l l
lle	A c t i n g P r e s i d e n t	
signature	MMangare	Date: 01/29/2019
E-mail:	glenn.morganeem-la.doe.gov	



Date: JAN 2 9 2019

N3B-19-0028

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

#### Subject: Transmittal of Paper Annual Reports for National Pollutant Discharge Elimination System IDs NMR050011 and NMR050012

To whom it may concern:

This letter documents the transmittal of paper copies of two Multi-Sector General Permit (MSGP) annual reports (U.S. Environmental Protection Agency [EPA] form 6100-28) for National Pollutant Discharge Elimination System (NPDES) ID NMR050011 (facility name TA-54 Maintenance Facility West) and NPDES ID NMR050012 (facility name TA-54 Areas G and L) by Newport News Nuclear BWXT – Los Alamos, LLC (N3B). The EPA requires that these reports be submitted electronically using the NPDES eReporting tool (NeT). However, a recent change in N3B's corporate management needs to be updated in the NeT system, so the system can recognize the new corporate officer responsible for certification. Because of the recent U.S. government shutdown and related closure of the EPA regional office, the update could not be made in time to comply with the January 30, 2019, report due date. With no means to certify the electronic reports, N3B was unable to complete the electronic filing of these documents. Because of the government closure, N3B was also unable to secure a waiver from the electronic reporting requirement from the EPA Region 6 office. However, a voice message and email requesting this waiver were submitted to Nasim Jahan of EPA Region 6 by N3B on January 28, 2019. No reply was received prior to finalization of this submittal.

N3B will update the electronic filing website to reflect appropriate corporate management as soon as possible.

If you have any questions or need additional information, please contact Jennifer von Rohr at (505) 695-4365 (jennifer.vonrohr@em-la.doe.gov) or Frazer Lockhart at (505) 257-8049 (frazer.lockhart@em-la.doe.gov).

Sincerely,

Glenn Morgan Acting Program Manager

Enclosure: One hard copy each – Completed EPA NPDES Form 6100-28 (annual report) for NPDES ID NMR050011 and for NPDES ID NMR050012

cc: (letter and enclosure[s] emailed) Nasim Jahan, EPA Region 6 Sarah Holcomb, NMED-SWQB David Rhodes, EM-LA Cheryl Rodriguez, EM-LA Emily Day, N3B Erich Evered, N3B Joseph Legare, N3B Frazer Lockhart, N3B Christian Maupin, N3B Glenn Morgan, N3B Bruce Robinson, N3B Jennifer von Rohr, N3B emla.docs@em.doe.gov N3B Records

3510-6		WASHINGTON, DC 20460 WASHINGTON, DC 20460 NOTICE OF INTENT (NOI) FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMIT	FORM Approved OMB No. 2040-0004
Permit Information			
laster Permit Number N	VR050000		
IPDES ID: NMR050011			
Bigibility Information			
tate/territory where your	facility is located: NM		
s your facility located on	Indian Country lands? No		
re you a <i>"Federal Operat</i>	or" as defined in Appendix A (http	ps://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_appendixa.pdf)? Yes	5
re you requesting a "no	exposure" exclusion from permit	tting under 40 CFR 122.26(g)? No	
ly indicating "Yes", I con sted in Part 1.1.3. Any di tate, or local authorities SWPPP), during an inspe nd 1.1.3 will be discharg Yes	firm that I understand that the MS scharges not expressly authorize after issuance of this permit via a ction, etc. If any discharges requ ed, they must be covered under a	SGP only authorizes the allowable stormwater discharges in Part 1.1.2 and the allowable nor ad in this permit cannot become authorized or shielded from liability under CWA section 40 any means, including the Notice of Intent (NOI) to be covered by the permit, the Stormwater uiring NPDES permit coverage other than the allowable stormwater and non-stormwater disc another NPDES permit.	n-stormwater discharges 2(k) by disclosure to EPA Pollution Prevention Plan charges listed in Parts 1.1.2
re you a new discharger	or a new source as defined in Ap	opendix A (https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_appendi	ixa.pdf)? Yes
Are you discharging water)? (See Appendi No	to any waters of the U.S. that are ix L (https://www.epa.gov/sites/pi	e designated by the state or tribal authority under its antidegradation policy as a Tier 3 wate roduction/files/2015-10/documents/msgp2015_appendixl.pdf))	er (Outstanding National Re
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Are you discharging water)? (See Appendi No oes your facility dischar acility Operator Information Operator Inform perator Name: Newport N perator Mailing Address: Idress Line 1: 600 Sixth S Idress Line 2: P/Postal Code: 87544 ounty or Similar Division Operator Point rst Name Middle Initial rganization:	to any waters of the U.S. that are ix L (https://www.epa.gov/sites/pi ge to a federal CERCLA site listed n nation Jews Nuclear BWXT Los Alamos Street h: LOS ALAMOS of Contact Informa Last Name: Genn Morga	e designated by the state or ribal authority under its antidegradation policy as a Tier 3 wate roduction/files/2015-10/documents/msgp2015_appendixl.pdf)) d in Appendix P (https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_a City: Los Alamos State: NM	r (Outstanding National Re
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# Organization: N3B-Los Alamos Phone: (505) 695-4365 Ext.

Email: jennifer.vonrohr@em-la.doe.gov

Facility Information

#### Facility Information

Facility Name: TA54 MAINTENANCE FACILITY WEST

Address Line 1: 600 SIXTH STREET	
Address Line 2:	City: LOS ALAMOS
ZIP/Postal Code: 87544	State: NM

County or Similar Division: LOS ALAMOS

#### Latitude/Longitude for the Facility

Latitude/Longitude: 35.8372°N, 106.2552°W

Latitude/Longitude Data Source: google earth

Is your facility located on Indian Country lands? No

Are you requesting coverage under this NOI as a "Federal Operator" as defined in Appendix A (https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\_appendixa.pdf)? Yes

What is the ownership type of the facility? Federal Facility (U.S. Government)

Estimated area of industrial activity at your facility exposed to stormwater (rounded to the nearest quarter acre): 1

#### Sector Specific Information

Primary Sector: P

Primary Subsector: P1

Primary SIC Code: 4231

Is your facility presently inactive and unstaffed? No

#### Discharge Information

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 CWAsection 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.

Horizontal Reference Datum: WGS 84

Yes

#### Federal Effluent Limitation Guidelines:

Identify the Effluent Limitation Guideline(s) that apply to your stormwater discharges. There are no guidelines associated with the sector(s) selected in the Facility Information section above.

Are you requesting permit coverage for any stormwater discharges subject to effluent limitation guidelines? No

#### Benchmark Monitoring:

Are you subject to benchmark monitoring requirements for a hardness-dependent metal? No

#### Other Discharge Information:

Does your facility discharge into a Municipal Separate Sewer System (MS4)? No

Are you discharging to any waters of the U.S. that are designated by the state or tribal authority under its antidegradation policy as a Tier 3 water (Outstanding National Resource Water) (See Appendix L (https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\_appendix1.pdf))?

Does your facility discharge to a federal CERCLA site listed in Appendix P (https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\_appendixp.pdf)? No

#### **Receiving Waters Information**

List all of the stormwater outfalls from your facility.

#### Outfall 049:

#### Applicable Sectors

Select the Sectors/Subsector(s) that apply to this outfall.

	Sector	Subsector
Ø	P - LAND TRANSPORTATION AND WAREHOUSING	P1 - Rallroad Transportation; Local and Highway Passenger Transportation; Motor Freight Transportation and Warehousing; United States Postal Service; Petroleum Bulk Stations and Terminals

#### Latitude/Longitude: 35.8372°N, 106.2548°W

Is this outfall Substantially Identical to an existing outfall? No

**Receiving Water** 

GNIS Name:	Waterbody Name:	Listed Water ID:
n/a	Pajarito Canyon	n/a

Is this receiving water 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)? No

Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? Yes

Cause of Impairment Group	Pollutant
METALS (OTHER THAN MERCURY)	Aluminum, total [as Al]
OTHER CAUSE	Cyanide, total [as CN]
POLYCHLORINATED BIPHENYLS (PCBS)	Polychlorinated biphenyls [PCBs]
RADIATION	Alpha, total

Has a TMDL been completed for this receiving waterbody? No

#### Monitoring Requirement Changes

□ Benchmark monitoring requirements have changed for this outfall.

□ Impaired Water monitoring requirements have changed for this outfall.

□ Effluent Limitations monitoring requirements have changed for this outfall.

#### SWPPP Information

Has the SWPPP been prepared in advance of filing this NOI, as required? Yes

 SWPPP Contact Information:

 First Name Middle Initial Last Name: Jennifer von Rohr

 Organization:

 Professional Title: Environmental Professional

 Phone: 505-695-4365
 Ext.

Email: jennifer.vonrohr@em-la.doe.gov

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:

C Option 1: Maintain a Current Copy of your SWPPP on an Internet Page (Universal Resource Locator or URL).

SWPPP web address URL: https://ext.em-la.doe.gov/EPRR/

#### Endangered Species Protection

Using the instructions in Appendix E (https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\_appendixe-2.pdf) of the MSGP, under which endangered species criterion listed in Part 1.1.4.5 are you eligible for coverage under this permit? Criterion D - A separate ESA section 7 consultation has been completed

Provide a brief summary of the basis for the criterion selected in Appendix E (https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\_appendixe-2.pdf):

An ESA evaluation prepared by Los Alamos National Laboratory determined stormwater discharges, allowable non-stormwater discharges and stormwater discharge related activities from the MSGP location at TA-54 Maintenance Facility West is not likely to adversely affect any species that is federally listed as endangered or threatened under Criterion D, Section iii and will not result in the adverse modification or destruction of habitat that is federally-designated as "critical habitat" under the ESA. This assessment received concurrence from the U.S. Fish and Wildlife Service in 1999. All changes to the Habitat Management Plan are assessed in a new consultation with the USFWS before implementation.

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.

Copies of any letters or other communications with the U.S. Fish and Wildlife Service or National Marine Fisheries Service:

Name	Created Date	Size
1999 HMP Concurrence Letter USFWS to DOE.pdf	04/03/2019 9:16 AM	276.55 KB
Historic Preservation		

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? No Using the instructions in Appendix F (https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\_appendixf.pdf) of the MSGP, under which historic properties preservation criterion listed in Part 1.1.4.6 are you eligible for coverage under this permit? Criterion A - No subsurface stormwater controls

#### 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 submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I have no personal knowledge that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Signing an electronic document on behalf of another person is subject to criminal, civil, administrative, or other lawful action.

Certified By: Frazer R. Lockhart

Certifier Title: Regulatory Compliance PM

Certifier Email: frazer.lockhart@em-la.doe.gov

Certified On: 04/04/2019 8:46 AM



# 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

#### David A. Gurule, Acting Area Manager

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

2

#### David A. Gurule, Acting Area Manager

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

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-I-336. If we can be of further assistance, please contact Carol Torrez of my staff at (505) 346-2525, ext. 115.

Sincerely,

mifer Fowler-Props Field Supervisor

CC:

Teralene Foxx, Project Manager, Ecology Group, Los Alamos National Laboratory, P.O. Box 1663, Mail Stop M887, Los Alamos, New Mexico 87545

Elizabeth Withers, U.S. Department of Energy, Los Alamos Area Office, 35<sup>th</sup> Street, Los Alamos, New Mexico

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