EMID-700760

# Storm Water Pollution Prevention Plan

# for

# Technical Area 54
# Maintenance Facility West

Newport News Nuclear BWXT-Los Alamos, LLC (N3B)
1200 Trinity Drive, Suite 150
Los Alamos, NM 87544
(505) 661-5918

## February 2020

**EM2020-0077**

**POINT OF CONTACT INFORMATION**

Regulatory Compliance Director: Emily Day
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1200 Trinity Drive, Suite 150, Los Alamos, NM 87544

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# 1.0 Facility Description and Contact Information

## 1.1 Facility Description

**Facility Information:**

Name of Facility: Los Alamos National Laboratory (LANL)

Street: 1200 Trinity Drive, Suite 150

City: Los Alamos State: NM ZIP Code: 87544

County or Similar Subdivision: TA-54 Maintenance Facility West (TA-54 MFW)

National Pollutant Discharge Elimination System (NPDES) ID: NMR050011 (i.e., Permit No.)

*Primary* Industrial Activity SIC code: 4231

Sector (2015 MSGP, Appendix D and Part 8): Sector P

Subsector (2015 MSGP, Appendix D and Part 8): Subsector P1

*Co-located* Industrial Activity SIC code: Not Applicable (N/A)

Sector (2015 MSGP, Appendix D): N/A

Subsector (2015 MSGP, Appendix D): N/A

**Latitude and Longitude:**

Latitude: 35.837249 º N (decimal degrees)

Longitude: -106. 255215 º W (decimal degrees)

Method for determining latitude/longitude (check one):
- ☐ USGS topographic map (scale:_____ )
- ☐ GPS
- ☒ Other (specify): Google Earth

**Horizontal Reference Datum (check one):** ☐ NAD 27 ☐ NAD 83 ☒ WGS 84

Is the facility located in Indian country? ☐ YES ☒ NO

If *yes* to the above question then provide name of Reservation
If *no* to the above question then indicate "N/A" N/A

Are you considered a "**Federal Operator**" of the facility? ☒ YES ☐ NO

> **Federal Operator** – 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 (continued)

**Discharge Information:**

Does this facility discharge storm water into a municipal separate storm sewer system (MS4)? ☐ 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 Canyon.

Does this facility discharge industrial storm water directly into any segment of "impaired water"? (Ref. 2015 MSGP, Appendix A definitions) ☒ YES ☐ NO

If *yes*, identify name of the impaired water(s) and segment(s), if applicable: Pajarito Canyon (Lower LANL boundary to Twomile Canyon)

Identify pollutant(s) causing impairment(s): polychlorinated biphenyls (PCBs), total recoverable aluminum, copper (dissolved), adjusted gross alpha, and total recoverable cyanide

Which pollutant(s) identified may be present in industrial storm water discharges from this facility?

None

Has a total maximum daily load (TMDL) been completed for any of the identified pollutants? ☐ YES ☒ NO

If *yes*, list TMDL pollutants: N/A

Does this facility discharge industrial storm water into receiving water designated as a Tier 2, Tier 2.5 or Tier 3 water? (Ref. 2015 MSGP, Appendix A definitions) ☐ YES ☒ NO

Are any of your storm water discharges subject to effluent limitation guidelines (ELGs)? (Ref. 2015 MSGP Table 1-1) ☐ YES ☒ NO

If *yes*, which guidelines apply? N/A

## 1.2 Contact Information/Responsible Parties

**Facility (Site) Operator(s):**

Name: Newport News Nuclear BWXT-Los Alamos, LLC
Address: 1200 Trinity Drive, Suite 150
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: 1200 Trinity Drive, Suite 150
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

Secondary POC:
John Guy, Shift Operations Manager/
Organization: Contract Handled Transuranic Waste
Phone : (505) 309-1320
Email : john.guy@em-la.doe.gov

**Site SWPPP:**

POC: Emily Day
Organization: Regulatory Compliance Director
Phone : (505) 695-4243
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**Facility SWPPP:**

Primary POC: John Guy
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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 (https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_finalpermit.pdf).

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 which became effective on May 1, 2018.

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 Compliance 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.

**Table 1.3-1**
**Storm water PPT Roles and Responsibilities**

| Role | Responsibilities |
|---|---|
| **Regulatory Compliance Director** | • Implements the SWPPP and associated BMPs<br>• Oversees the assigned duties of PPT members<br>• Ensures inspection problems are remedied/corrected<br>• Assists or designates a representative to assist in performing routine facility inspections (RFIs) in accordance with section 4.6, *Facility Routine Inspections and Quarterly Visual Inspections* of this SWPPP<br>• Ensures training as required by the 2015 MSGP is available and the appropriate N3B personnel receive the training specified in section 4.5, *Employee Training* of this SWPPP |
| **Environmental Remediation Surface Water Program Lead** | • Provides SWPPP technical guidance<br>• Provides BMP guidance (selection and installation)<br>• Aids in performing and documenting inspections and assessments<br>• Performs site compliance evaluations |
| **CH-TRU Shift Operations Manager** | • Oversees good housekeeping practices<br>• Oversees BMP maintenance<br>• Ensures operators receive SWPP/2015 MSGP-required training<br>• Notifies the Regulatory 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 |
| **CH-TRU Operations Staff** | • Assists with cleanup as necessary (i.e., spilled or released pollutants)<br>• Directs the appropriate waste management of all resultant cleanup materials |
| **Regulatory Compliance Lead** | • Develops SWPPP training<br>• Provides SWPPP technical guidance<br>• Conducts recordkeeping and regulatory reporting<br>• Ensures corrective actions are scheduled and implemented in a timely manner and in accordance with the permit<br>• Provides oversight of the SWPPP (e.g., revisions, etc.)<br>• 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 |
| **Maintenance Connection Storm Water Database Administrator** | • Maintains and updates the CADB based on input from MSGP Storm Water Team personnel<br>• Responsible for the generation of Routine Facility Inspection work statements<br>• 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.

**Table 2.1-1**
**Potential Pollutants Associated with Industrial Activity**

| 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 |

## 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 reinitiated 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™ 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™ 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 Regulatory Compliance. Reporting, if necessary will be completed by Regulatory Compliance in accordance 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 Regulatory Compliance. External agency notification (as determined by Regulatory Compliance 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™ 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-AOP-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 Schedule | | | |
|---|---|---|---|
| Q1 | January 1 | – | March 31 |
| Q2 | April 1 | – | June 30 |
| Q3 | July 1 | – | September 30 |
| Q4 | October 1 | – | December 31 |

Any required corrective actions identified during the inspection will be addressed in accordance with N3B-SOP-ER-5016, *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 Quarterly 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-SOP-ER-5016, *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.

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

| 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 | 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 | — | 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 | P | | | | | | |

# 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) (https://permalink.lanl.gov/object/tr?what=info:lanl-repo/lareport/LA-UR-15-28610) 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.

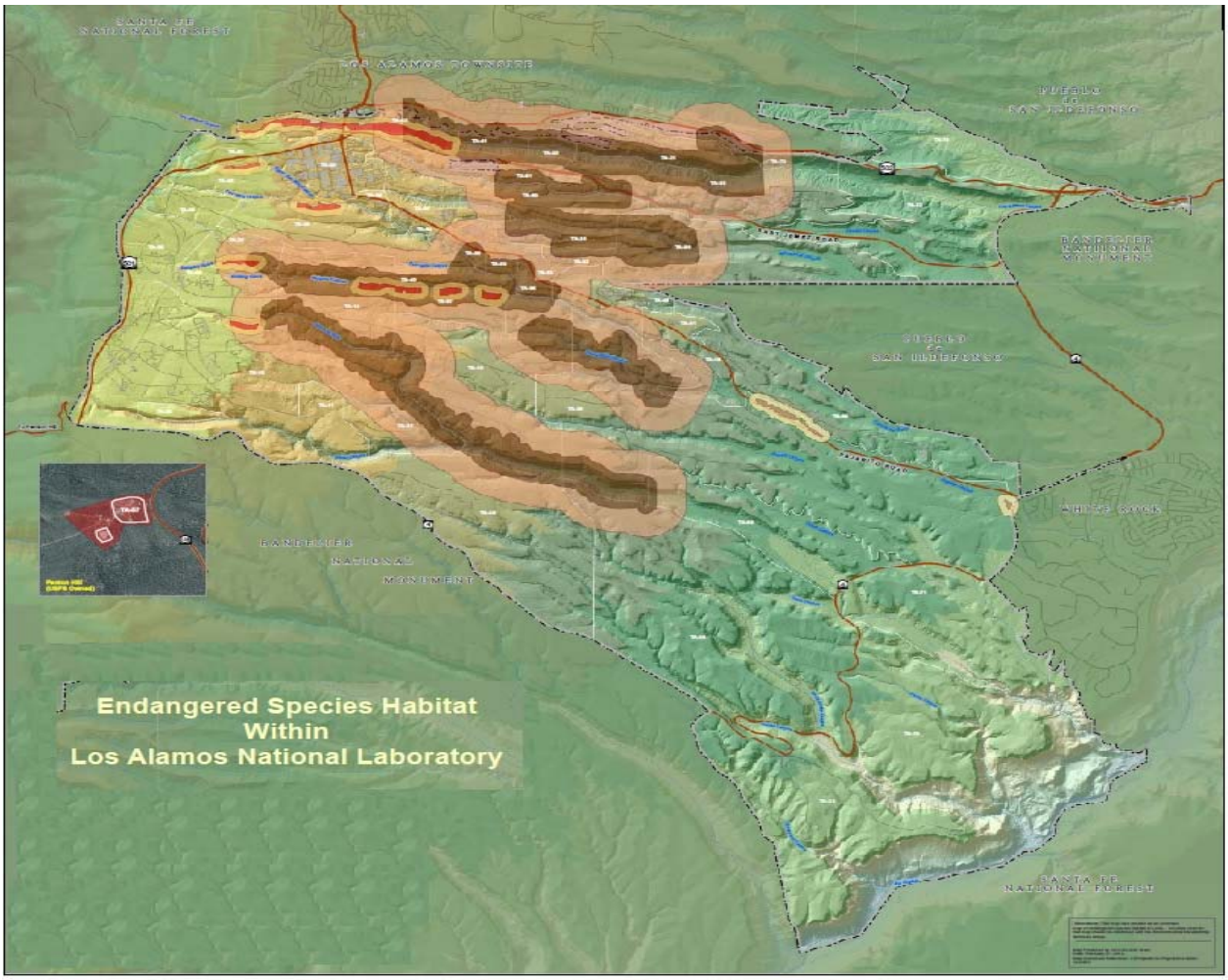



**Figure 5.1-1 Endangered species habitat within LANL**

## 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, Regulatory Compliance 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:**

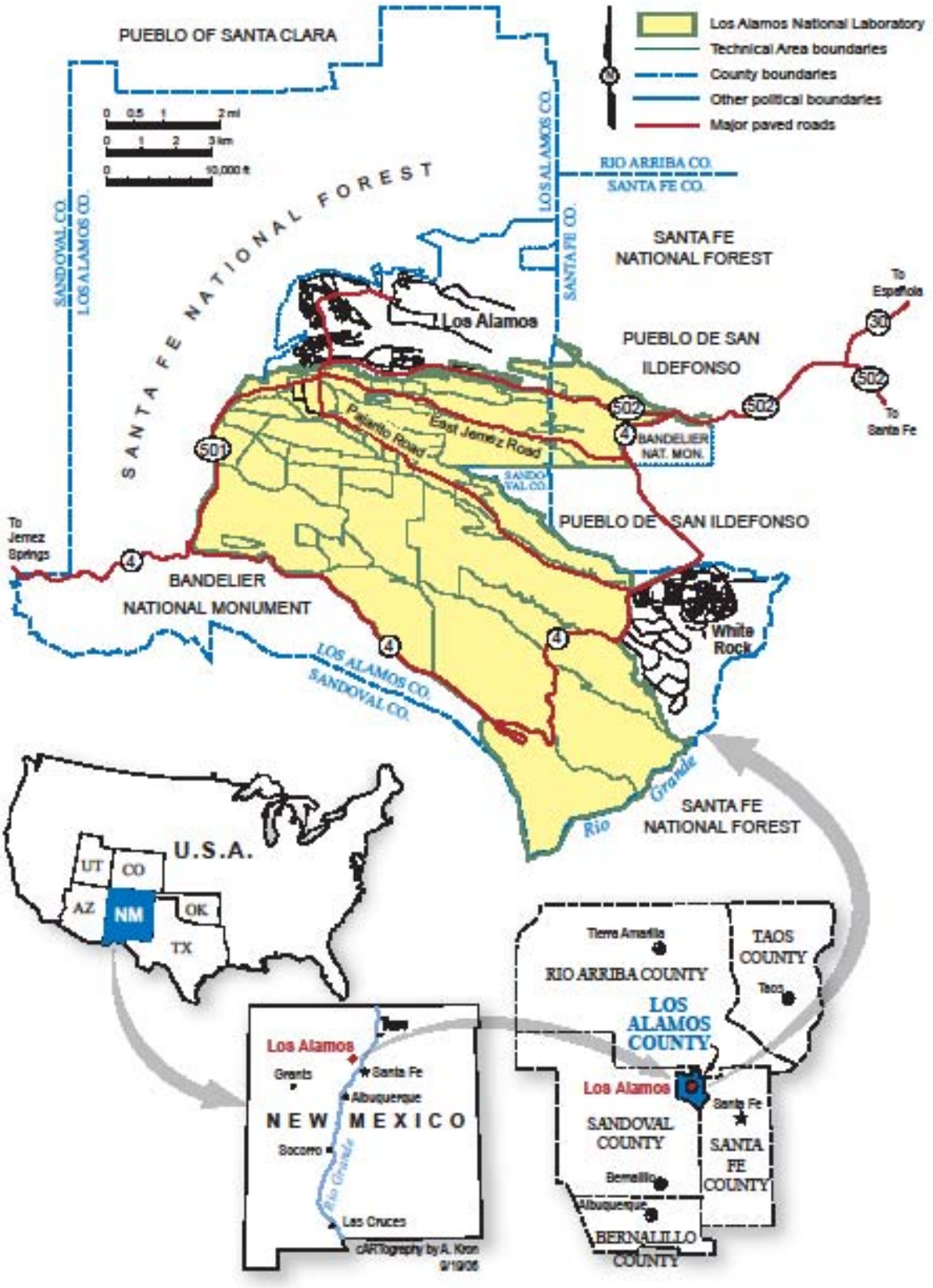
**Printed Name:** Emily Day **Title:** N3B Regulatory Compliance Director

**Signature:**  **Date:** 2/19/20

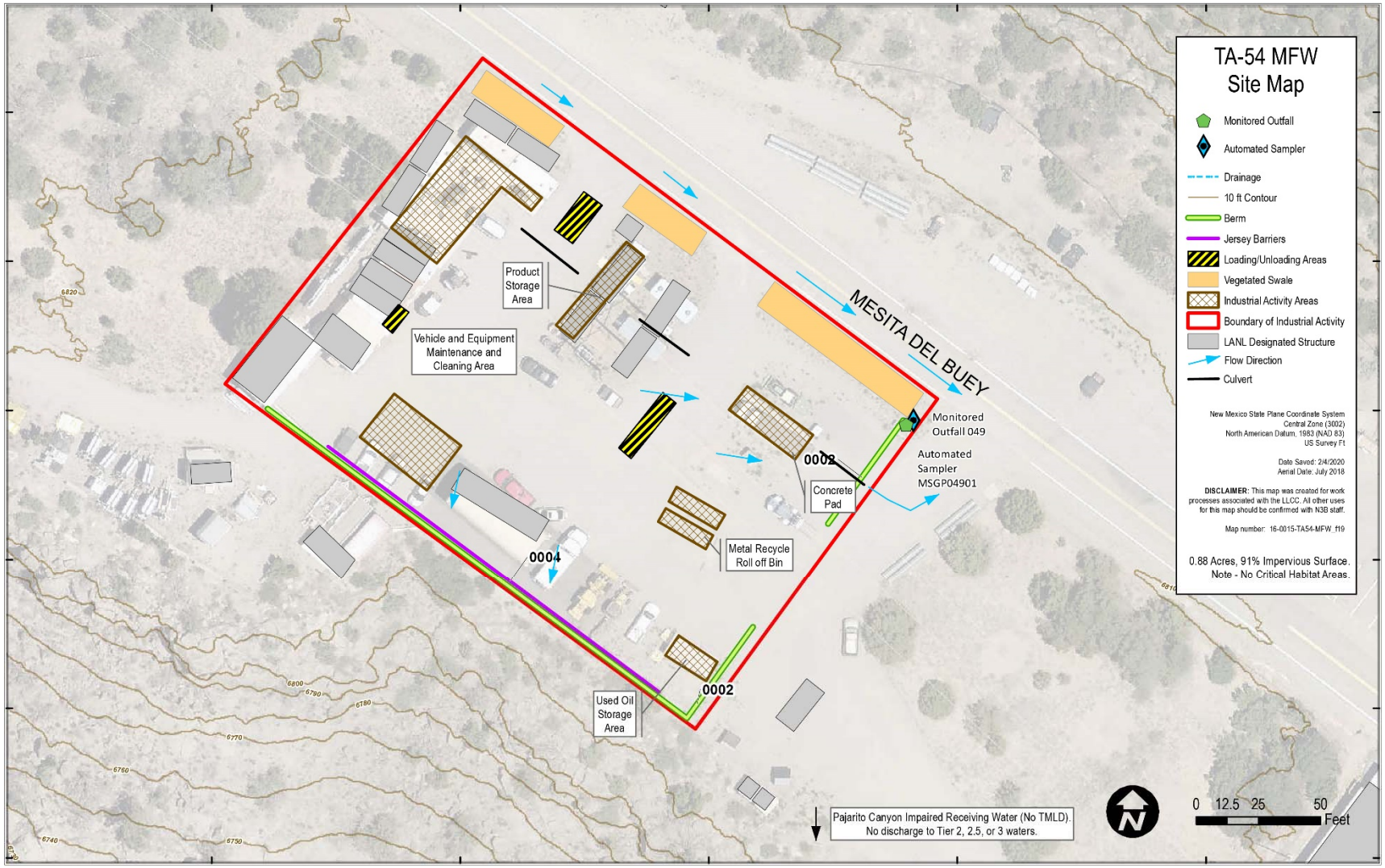
## 8.0 SWPPP Modifications

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 Regulatory Compliance 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 A General Location Map



## Attachment B Site Map


TA-54 MFW
Site Map
Monitored Outfall
Automated Sampler
Drainage
10 ft Contour
Berm
Jersey Barriers
Loading/Unloading Areas
Vegetated Swale
Industrial Activity Areas
Boundary of Industrial Activity
LANL Designated Structure
Flow Direction
Culvert
New Mexico State Plane Coordinate System
Central Zone (3002)
North American Datum, 1983 (NAD 83)
US Survey Ft
Date Saved: 2/4/2020
Aerial Date: July 2018
DISCLAIMER: This map was created for work processes associated with the LLCC. All other uses for this map should be confirmed with N3B staff.
Map number: 16-0015-TA54-MFW_f19
0.88 Acres, 91% Impervious Surface.
Note - No Critical Habitat Areas.
Product Storage Area
Vehicle and Equipment Maintenance and Cleaning Area
MESITA DEL BUEY
Monitored Outfall 049
Automated Sampler MSGP04901
0002
Concrete Pad
Metal Recycle Roll off Bin
0004
0002
Used Oil Storage Area
Pajarito Canyon Impaired Receiving Water (No TMLD).
No discharge to Tier 2, 2.5, or 3 waters.
0 12.5 25 50
Feet

## Attachment C Relevant Procedures

| 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-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 D Routine Facility Inspections Form and Reports

# Work Order MSGP-77927

MSGP Monitoring Stations
Printed 2/13/2020 - 3:14 PM

## Maintenance Details

**Requested:** 12/2/2019 12:04:15 AM
**Phone:**
**Email:**
**Procedure:** MSGP Stormwater Industrial Routine Facility Inspection (N3B-SOP-ER-5016-1)
**Last PM:** 12/11/2019
**Project:** 2019 Routine Facility Inspections (P-MSGP-5921)

**Target:** 3/31/2020 (14) hrs
**Priority/Type:** / Preventive

MSGP TA 54
RG249.5
**TA-54 MFW**

**Reason:** MSGP Stormwater Industrial Routine Facility Inspection

## Tasks

| # | Description | Meas. | No | Yes |
|---|---|---|---|---|
| | **WEATHER INFORMATION** | | | |
| 20 | Describe the weather at time of inspection in the task comment. Document the temperature (F°) in the "Reading" field of this line. | | ☐ | ☐ |
| | **Within the Facility Boundary** | | | |
| 40 | Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "No", describe: | | ☐ | ☐ |
| 50 | If "No" has a CAR been previously initiated for this new discharge? (Range: 0 - 0) | | ☐ | ☐ |
| 60 | Is the facility free of discharge of pollutants at the time of inspection? If "No" describe: | | ☐ | ☐ |
| 70 | Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe: | | ☐ | ☐ |
| | **Outfall Inspection needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comment)** | | | |
| 90 | **Monitored Outfall [049]** Free of evidence of erosion? (Range: 0 - 0) | | ☐ | ☐ |
| 100 | **Monitored Outfall [049]** Flow Dissipation Devices Operating Effectively? (Range: 0 - 0) | | ☐ | ☐ |
| 110 | **Monitored Outfall [049]** Free of evidence of pollutants in Discharges and/or Receiving Water? (Range: 0 - 0) | | ☐ | ☐ |
| | **Control Measures (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comments).** | | | |
| 130 | **Earthen Berm [5400403010002]** Is control measure operating effectively? If "No" describe condition and need for maintenance, repair, or replacement. | | ☐ | ☐ |
| 140 | **Earthen Berm [5400403010003]** Is control measure operating effectively? If "No" describe condition and need for maintenance, repair, or replacement. | | ☐ | ☐ |
| 150 | **Jersey Barriers [5400403170004]** Is control measure operating effectively? If "No" describe condition and need for maintenance, repair, or replacement. | | ☐ | ☐ |
| 160 | **Vegetated Swale [5400404070001]** Is control measure operating effectively? If "No" describe condition and need for maintenance, repair, or replacement. | | ☐ | ☐ |
| | **Area/Activity exposed to stormwater (identify needed maintenance or a description of corrective actions in relevant task comment).** | | | |
| 180 | Material loading/unloading and storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe. | | ☐ | ☐ |
| 190 | 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. | | ☐ | ☐ |
| 210 | Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe. | | ☐ | ☐ |

| | | | | |
|---|---|---|---|---|
| 220 | Equipment operation and maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe. | | ☐ | ☐ |
| ~~230~~ | Fueling areas: controls adequate (appropriate, effective, and operating)? If "No" describe. | | ☐ | ☐ |
| 240 | Outdoor vehicle and equipment washing areas: controls adequate (appropriate, effective, and operating)? If "No" describe. | | ☐ | ☐ |
| 250 | Machinery: controls adequate (appropriate, effective, and operating)? If "No" describe. | | ☐ | ☐ |
| 260 | Waste handling and disposal areas: controls adequate (appropriate, effective, and operating)? If "No" describe. | | ☐ | ☐ |
| 270 | Erodible areas/construction: controls adequate (appropriate, effective, and operating)? If "No" describe. | | ☐ | ☐ |
| 280 | Locations and sources of run-on to the site: controls adequate (appropriate, effective, and operating)? If "No" describe. | | ☐ | ☐ |
| 290 | Non-stormwater/illicit connections: controls adequate (appropriate, effective, and operating)? If "No" describe. | | ☐ | ☐ |
| 300 | Dust generation and vehicle tracking: controls adequate (appropriate, effective, and operating)? If "No" describe. | | ☐ | ☐ |
| 310 | Housekeeping (Industrial materials/residues/trash in contact with stormwater): controls adequate (appropriate, effective, and operating)? If "No" describe. | | ☐ | ☐ |
| 320 | Leaks and spills: controls adequate (appropriate, effective, and operating)? If "No" describe. | | ☐ | ☐ |
| 330 | **Sector P [54004-P]** Vehicle storage/maintenance areas: controls adequate (appropriate, effective, and operating)? If "No" describe. | | ☐ | ☐ |
| **Non-Compliance** | | | | |
| 350 | Free of incidents of observed non-compliance not associated with any of the above? If "No" describe. (Range: 0 - 0) | | ☐ | ☐ |
| **Additional Controls** | | | | |
| 370 | Are permit requirements satisfied with existing control measure(s)? If "No: describe additional control measure(s) needed. (Range: 0 - 0) | | ☐ | ☐ |

## Labor Report

**Completed:** _____

**Report:** _____

**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: Elizabeth Lowes 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 form is to be filled out in accordance with N3B-PXXX - *Procedure Title* . All fields are required to be completed. Identify probable sources of any observed stormwater contamination. Include any additional comments, descriptions, and any corrective actions necessary. Once complete, please send to the R&SI-Compliance Director for evaluation and processing. If there are any questions regarding this form, please contact R&SI-Compliance Director. | | | | |
| Outfall ID | | | | |
| Field Inspector Name (printed) | | | | |
| Field Inspector Signature | | | | |
| Field Inspector N3B ID/Z number | | | | |
| Other staff present | | | | |
| Sample Information | | | | |
| Monitoring Period | | | | |
| Discharge Began | Date | Time | Duration | |
| Nature of Discharge | Rain | Snow | Hail | Other |
| | Description | | Event Total Inches | |
| Sample Collection | Date | Time | | |
| Collected first 30 minutes of discharge? | | Yes | No | |
| | If No, describe | | | |
| Date Visually Assessed | Date | Time | | |
| | Description | | | |
| Sample Assessment | | | | |
| Color | Yes | No | | |
| | Description | | | |
| Odor | Yes | No | | |
| | Description | | | |
| Clarity | Yes | No | | |
| | Description | | | |
| Floating Solids | Yes | No | | |
| | Description | | | |
| Settled Solids | Yes | No | | |
| | Description | | | |
| Suspended Solids | Yes | No | | |
| | Description | | | |
| Foam* (gently shake) | Yes | No | | |
| | Description | | | |
| Oil Sheen* | Yes | No | | |
| | Description | | | |
| Other Indicators (description) | | | | |
| | | | | |
| Notes | | | | |
| | | | | |

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

# 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 |

## Attachment F SWPPP Modifications

| Name And Number | Date of Revision | History of Revision |
|---|---|---|
| | | |
| | | |
| | | |
| | | |
| | | |

## Attachment G Reference Documents

EMID-700519

N3B Los Alamos

Date: JUL 25 2019

N3B-19-0218

Charles Maguire
U.S. Environmental Protection Agency
Region 6 Water Division Director
1201 Elm Street, Suite 500
Dallas, TX 75270-2102

**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 President 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 EPA:

- Frazer Lockhart, Regulatory and Stakeholder Interface Program Manager
- Elizabeth Lowes, Environment, Safety, and Health 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 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

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@em-la.doe.gov).

Sincerely,

Glenn Morgan
President

cc: (date-stamped letter emailed)
Arturo Duran, EM-LA
Douglas Hintze, EM-LA
David Rhodes, EM-LA
Cheryl Rodriguez, EM-LA
Michael Alexander, N3B
Donald Carlson, N3B
Emily Day, N3B
Michael Erickson, N3B
Erich Evered, N3B
Debby Holgerson, N3B
Joseph Legare, N3B
Frazer Lockhart, N3B
Elizabeth Lowes, 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


U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.
DALLAS, TX 75270
OFFICIAL USE
Certified Mail Fee $3.50
Extra Services & Fees (check box, add fee as appropriate)
Return Receipt (hardcopy) $2.80
Return Receipt (electronic) $0.00
Certified Mail Restricted Delivery $0.00
Adult Signature Required $0.00
Adult Signature Restricted Delivery $0.00
Postage $1.00
Total Postage and Fees $7.30
Sent To Charles Maguire, Water Div. Dir.
U.S. Environmental Protection Agency
Street and Apt. No., or PO Box No. 1201 Elm Street, Suite 500
City, State, ZIP+4® Dallas TX 75270-2102
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions
LOS ALAMOS, NM 87544
JUL 26 2019
Postmark Here
07/26/2019
0544 01
7016 0600 0000 9073 6272

| NPDES FORM 3510-6 | EPA | UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460 NOTICE OF INTENT (NOI) FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMIT | FORM Approved OMB No. 2040-0004 |
|---|---|---|---|

Permit Information

**Master Permit Number:** NMR050000

**NPDES ID:** NMR050011

Eligibility Information

**State/territory where your facility is located:** NM

**Is your facility located on Federally Recognized Indian Country Lands?** No

**Are you a *"Federal Operator"* as defined in Appendix A (https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_appendixa.pdf)?** Yes

**Which type of form would you like to submit?** Notice of Intent (NOI)

**By indicating "Yes", I confirm that I understand that the MSGP only authorizes the allowable stormwater discharges in Part 1.1.2 and the allowable non-stormwater discharges listed in Part 1.1.3. Any discharges not expressly authorized in this permit cannot become authorized or shielded from liability under CWA section 402(k) by disclosure to EPA, state, or local authorities after issuance of this permit via any means, including the Notice of Intent (NOI) to be covered by the permit, the Stormwater Pollution Prevention Plan (SWPPP), during an inspection, etc. If any discharges requiring NPDES permit coverage other than the allowable stormwater and non-stormwater discharges listed in Parts 1.1.2 and 1.1.3 will be discharged, they must be covered under another NPDES permit.**

Yes

**Are you a new discharger or a new source as defined in Appendix A (https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_appendixa.pdf)?** Yes

- **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_appendixl.pdf))**

  No

**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

Operator Information

## Operator Information

**Operator Name:** Newport News Nuclear BWXT Los Alamos

## Operator Mailing Address

**Address Line 1:** 1200 Trinity Drive, Suite 150

**Address Line 2:**

**City:** Los Alamos

**ZIP/Postal Code:** 87544

**State:** NM

**County or Similar Division:** LOS ALAMOS

## Operator Point of Contact Information

**First Name Middle Initial Last Name:** Glenn . Morgan

**Organization:**

**Title:** N3B Program Manager

**Phone:** 505-309-1374 **Ext.:**

**Email:** glenn.morgan@em-la.doe.gov

## NOI Preparer Information

**First Name Middle Initial Last Name:** Jennifer . von Rohr

**Organization:** Newport News Nuclear BWXT Los Alamos

**Phone:** 505-257-7424 **Ext.:**

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

Facility Information

## Facility Information

**Facility Name:** TA54 MAINTENANCE FACILITY WEST

## Facility Address

**Address Line 1:** 1200 Trinity Drive

**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

**Horizontal Reference Datum:** WGS 84

**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 CWA section 402(k) by disclosure to EPA, state, or local authorities after issuance of this permit via any means, including the Notice of Intent (NOI) to be covered by the permit, the Stormwater Pollution Prevention Plan (SWPPP), during an inspection, etc. If any discharges requiring NPDES permit coverage other than the allowable stormwater and non-stormwater discharges listed in Parts 1.1.2 and 1.1.3 will be discharged, they must be covered under another NPDES permit.**

Yes

## 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

## 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 |
|---|---|---|
| ☑ | **P** - LAND TRANSPORTATION AND WAREHOUSING | **P1** - Railroad 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

☐ **This outfall is *Substantially Identical* to an existing outfall.**

### Receiving Water

**GNIS Name:** n/a

**Waterbody Name:** Pajarito Canyon

**Listed Water ID:** 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 |
|---|---|
| POLYCHLORINATED BIPHENYLS (PCBS) | Polychlorinated biphenyls [PCBs] |
| RADIATION | Alpha, total |
| METALS (OTHER THAN MERCURY) | Aluminum, total [as Al] |
| OTHER CAUSE | Cyanide, total [as CN] |

**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:

**Note: you are not required to post any confidential business information (CBI) or restricted information (as defined in Appendix A (https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_appendixa.pdf)) (such information may be redacted), but you must clearly identify those portions of the SWPPP that are being withheld from public access.**

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

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

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

## 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 | Uploaded Date | Size |
|---|---|---|
| 1999 HMP Concurrence Letter USFWS to DOE.pdf (attachment/372350) | 09/09/2019 | 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, 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 am aware 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:** Elizabeth Lowes

**Certifier Title:** ES&H Program Manager

**Certifier Email:** elizabeth.lowes@em-la.doe.gov

**Certified On:** 01/16/2020 6:27 PM ET