



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

April 2021

EM2021-0203

POINT OF CONTACT INFORMATION

Regulatory Compliance Director: Emily Day
(505) 695-4243; email: emily.day@em-la.doe.gov
1200 Trinity Drive, Suite 150, Los Alamos, NM 87544

TABLE OF CONTENTS

1.0 Facility Description and Contact Information 1

1.1 Facility Description 1

1.2 Contact Information/Responsible Parties..... 3

1.3 Storm Water Pollution Prevention Plan/Team Members 4

1.4 Site Description 6

1.5 General Location Map 6

1.6 Site Map 6

2.0 Potential Pollutant Sources 7

2.1 Potential Pollutants Associated with Industrial Activity 7

2.2 Spills and Leaks 7

2.3 Unauthorized Non-Storm Water Discharges Documentation 8

2.4 Salt Storage..... 8

2.5 Sampling Data Summary 8

3.0 Storm Water Control Measures 9

3.1 Non-Numeric Technology-Based Effluent Limits (BPT/BAT/BCT) 9

3.1.1 Minimize Exposure..... 9

3.1.2 Good Housekeeping 10

3.1.3 Maintenance 11

3.1.4 Spill Prevention and Response..... 11

3.1.5 Erosion, Sediment, and Storm Water Runoff Controls 12

3.1.6 Employee Training 12

3.1.7 Non-Storm Water Discharges..... 13

3.1.8 Dust Generation and Vehicle Tracking of Industrial Materials 13

3.2 Sector-Specific Non-Numeric Effluent Limits 13

3.3 Numeric Effluent Limitations Based on Effluent Limitations Guidelines 13

3.4 Water Quality-Based Effluent Limitations and Water Quality Standards 13

4.0 Schedules and Procedures 14

4.1 Housekeeping 14

4.2 Equipment Maintenance 14

4.3 Employee Training 14

5.0 Inspection and Monitoring Requirements 15

5.1 Routine Facility Inspections 15

5.2 Quarterly Visual Assessment of Storm Water Discharges..... 16

5.3 Monitoring..... 17

5.3.1 Monitoring Schedule 18

5.3.2 Monitoring Results 19

5.3.3 Recordkeeping..... 20

6.0 Documentation to Support Eligibility Considerations under Other Federal Laws ... 21

6.1 Documentation Regarding Endangered Species 21

6.2 Documentation regarding Historic Properties 23

7.0 Corrective Actions and Deadlines 24

7.1 SWPPP Review and Revision to Ensure Effluent Limits are Met 24

7.2 Conditions Requiring SWPPP Review to Determine if Modifications Are Necessary 24

7.3 Corrective Action Deadlines 24

8.0 SWPPP Certification 25

9.0 SWPPP Modifications 26

Attachment A General Location Map 27

Attachment B Site Map 28

Attachment C Relevant Procedures 30

Attachment D Routine Facility Inspections Form and Report 31

Attachment E Quarterly Visual Inspection Form and Report 32

Attachment F SWPPP Modifications 33

Attachment G Reference Documents 34

Figure

Figure 6.1-1 Endangered species habitat within LANL 22

Tables

Table 1.3-1 Storm Water PPT Roles and 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 8

Table 5.3-1 TA-54 MFW MSGP Sampling Summary – Outfall 049 18

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

Primary Industrial Activity SIC code: 4231

Sector (2021 MSGP, Appendix D and Part 8): Sector P

Subsector (2021 MSGP, Appendix D and Part 8): Subsector P1

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

Sector (2021 MSGP, Appendix D): N/A

Subsector (2021 MSGP, Appendix D): N/A

Latitude and Longitude:

Latitude: 35.837249 ° N (decimal degrees)

Longitude: -106. 255215 ° 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: 0.88 acre

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:

Pajarito Canyon (Lower LANL boundary to Twomile Canyon)

Does this facility discharge industrial storm water directly into any segment of "impaired water"? (Ref. 2021 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, dissolved copper, adjusted gross alpha, and total recoverable cyanide

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

Based on historic sampling results and studies of naturally occurring background levels, adjusted gross alpha, total recoverable aluminum, and dissolved copper may be present in storm water samples collected from this facility.

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. 2021 MSGP, Appendix A definitions) YES NO

Are any of your storm water discharges subject to effluent limitation guidelines (ELGs)? (Ref. 2021 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 (N3B)
Address: 1200 Trinity Drive, Suite 150
Los Alamos, NM 87544
Phone: (505) 661-5918

Facility Owner(s):

Name: N3B Contact-Handled Transuranic (CH-TRU) Program
TA-54 Operations Center
Address: 1200 Trinity Drive, Suite 150
Los Alamos, NM 87544
Phone: (505) 257-8400

Primary POC: Gail Helm, Facility Operations Director
Organization: N3B CH-TRU Waste Operations
Phone: (505) 309-1319
Email: gail.helm@em-la.doe.gov

Secondary POC: John Guy or alternate, Shift Operations Manager
Organization: N3B CH-TRU Waste Operations
Phone: (505) 309-1320
Email: john.guy@em-la.doe.gov

Site SWPPP:

POC: Emily Day, Director
Organization: N3B Regulatory Compliance
Phone: (505) 695-4243
Email: emily.day@em-la.doe.gov

Facility SWPPP:

Primary POC: John Guy or alternate, Shift Operations Manager
Organization: N3B CH-TRU Waste Operations
Phone: (505) 309-1320
Email: john.guy@em-la.doe.gov

Secondary POC: Jennifer von Rohr, Environmental Professional
Organization: N3B Regulatory Compliance
Phone: (505) 695-4365
Email: jennifer.vonrohr@em-la.doe.gov

1.3 Storm Water Pollution Prevention Plan/Team Members

N3B-controlled Los Alamos National Laboratory (LANL) facilities located at Technical Area 54 (TA-54) Maintenance Facility West (MFW) operate under the National Pollutant Discharge Elimination System (NPDES) 2021 Multi-Sector General Permit (MSGP) for Storm Water Discharges Associated with Industrial Activity, which governs storm water discharge from industrial activities.

Under the MSGP, the U.S. Environmental Protection Agency (EPA) requires the implementation of a site-specific Storm Water Pollution Prevention Plan (SWPPP). This SWPPP has been 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 2021 MSGP (<https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-epas-2021-msgp>).

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. A notice of intent (NOI) to operate this facility under the 2015 MSGP was submitted to EPA Region 6 by N3B in April 2018; NPDES coverage for this facility was authorized by EPA on May 1, 2018. The 2015 MSGP expired on June 3, 2020, and was administratively continued pending the issuance of a new general permit. The 2021 MSGP, issued January 15, 2021, became effective March 1, 2021. N3B will seek authorization to discharge under the 2021 MSGP.

The purpose of this SWPPP is to ensure that all potential sources of storm water pollution at TA-54 MFW are documented. The SWPPP also describes specific storm water control measures, known as best management practices (BMPs), that are used to reduce or eliminate pollutants in storm water discharges and identifies the processes and procedures in place to comply with the terms and conditions of the 2021 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 documentation. Collectively, the incorporation of BMPs into facility operations effectively reduces the potential for the introduction of contaminants into the waters of the United States and supports facility eligibility under the 2021 MSGP.

This SWPPP is intended to be a living document with updates incorporated as necessary to reflect facility or operational changes with the potential to impact storm water discharge. The 2021 MSGP requires prompt revisions of this SWPPP to reflect such changes.

This SWPPP applies to storm water discharges from industrial activities associated with vehicle and heavy equipment maintenance operations conducted by N3B personnel at TA-54 MFW. 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

N3B has established a storm water Pollution Prevention Team (PPT), the members of which are responsible for: (1) the development, implementation, maintenance, and revision of this SWPPP, and (2) maintaining control measures and taking corrective actions, as required by the 2021 MSGP. In addition, PPT members receive SWPPP training as part of membership requirements (see Table 1.3-1, Storm Water PPT Roles and Responsibilities, 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 (ER SWP), the CH-TRU Program, and the Regulatory Compliance organization. Storm water PPT participants are selected based on their knowledge of heavy equipment maintenance activities, TA-54 operations, and the potential impact of these activities on storm water runoff.

Storm water PPT duties include collecting storm water samples, conducting visual assessments of storm water runoff for indications of contamination, conducting routine facility inspections, identifying and documenting corrective actions, reporting in accordance with 2021 MSGP requirements, and implementing and modifying this SWPPP.

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

Roles	Responsibilities
Regulatory Compliance Director	<ul style="list-style-type: none"> • Oversees implementation of the SWPPP and associated BMPs • Oversees the assigned duties of PPT members • Ensures corrective actions are remedied/corrected and properly documented • Ensures routine facility inspections are conducted in accordance with section 4.6, Routine Facility Inspections and Quarterly Visual Assessments, of this SWPPP • Ensures training required by the 2021 MSGP is available and the appropriate N3B personnel receive the training specified in section 4.3, Employee Training, of this SWPPP
ER SWP Lead	<ul style="list-style-type: none"> • Provides SWPPP technical guidance • Provides BMP guidance (during selection and installation) • Aids in performing and documenting inspections and assessments • Performs site compliance evaluations, including routine facility inspections described in section 5.1, Routine Facility Inspections, of this SWPPP
CH-TRU Shift Operations Manager	<ul style="list-style-type: none"> • Responsible for the implementation of good housekeeping practices • Oversees BMP maintenance • Ensures corrective actions are scheduled/implemented in a timely manner • Ensures operators receive annual SWPPP/2021 MSGP-required training • 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	<ul style="list-style-type: none"> • Assists with cleanup as necessary (i.e., spill of released pollutants) • Directs the appropriate waste management of all resultant cleanup materials • Performs quarterly visual assessments described in section 5.2, Quarterly Visual Assessment of Storm Water Discharges, of this SWPPP • Assists ER SWP in the performance of Routine Facility Inspections
Regulatory Compliance Lead	<ul style="list-style-type: none"> • Develops SWPPP training • Provides SWPPP technical guidance • Conducts recordkeeping and regulatory reporting • Provides oversight of the SWPPP (e.g., revisions, etc.) • 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

Roles	Responsibilities
Maintenance Connection Storm Water Database Administrator	<ul style="list-style-type: none"> • Maintains and updates the Maintenance Connection (MainConn) database based on input from MSGP Storm Water Team personnel • Responsible for the generation of routine facility inspection work statements • 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 of 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 include vehicle and heavy equipment maintenance and repair and related ancillary operations. 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, vegetation and pest management, 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. N3B CH-TRU personnel conduct vehicle and heavy equipment maintenance and repair activities at the TA-54 MFW.

The average annual rainfall for Los Alamos is 18.51 in. Intense thunderstorms are common in the Los Alamos area during August and September. 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. The receiving waters for the TA-54 MFW facility flow to the Rio Grande, located approximately 3 miles east of the site.

1.5 General Location Map

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

1.6 Site Map

The TA-54 MFW industrial site is 0.88 acre. The location and extent of significant structures, impervious areas, direction of storm water flow, locations of existing structural and vegetative storm water control measures, and the outfall location are identified in Attachment B, Site Map.

There are no locations or sources of storm water run-on to the site from adjacent property that contain significant quantities of pollutants. There are no solid waste management units (SWMUs) or areas of concern (AOCs) located within or immediately adjacent to the TA-54 MFW industrial area.

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 within the past 3 years.

**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
Pest and vegetation control (mechanical and chemical)	Pesticides, herbicides, fuels
Building and facility maintenance	Oils, paints, cleaners, volatile organic compounds, semivolatile organic compounds

MSGP-authorized non-storm water discharges associated with fire hydrant maintenance; fire suppression system maintenance; uncontaminated heating, ventilation, and air conditioning (HVAC) condensate; and safety shower/eye wash maintenance occur at all industrial areas of TA-54, potentially including MFW. In addition, potable water is applied to unpaved areas as necessary for dust suppression.

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 associated potential 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 the facility, which runs 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 the 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 and eastward into a culvert leading to Pajarito Canyon.

Description of Past Spills/Leaks

While N3B is aware of minor leaks of fuels and hydraulic fluids from vehicles and equipment used in normal operations at TA-54 Areas G and L, no spills or releases are known to have discharged into a watercourse or canyon or migrated from the site during N3B’s control of operations at TA-54 (April 2018 to the present). Minor spills or leaks, if they occur, will be documented in accordance with N3B-AOP-TRU-3003, “Material Release or Spill,” and N3B-SOP-RP-0005, “Radiological Emergency Response,” 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. Unauthorized spills or non-storm water discharges, if they occur, will be documented in accordance with corrective action documentation described in section 7.0 of this SWPPP.

2.4 Salt Storage

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

Storm water sampling associated with the industrial activity at MFW has been conducted in compliance with MSGP coverage by N3B since 2018. All of the storm water sampling results from MFW, including samples collected before 2018 by the prior LANL operator (Los Alamos National Security, LLC [LANS]) and since 2018 by N3B, are maintained in the publicly accessible Intellus database (<https://www.intellusnm.com/>). Reporting of monitoring results is provided electronically to EPA via the Central Data Exchange NetDMR website (<https://cdx.epa.gov/>).

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. Analytical results of storm water samples collected from monitored outfall 049 since N3B’s control of operations at this facility began have indicated detected values of aluminum, copper, and adjusted gross alpha. Benchmark sampling is not required for this outfall. Monitoring requirements applicable to this site are summarized in section 5.3.1 of this SWPPP.

3.0 Storm Water Control Measures

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

N3B's CH-TRU organization is responsible for the operational and support activities conducted at TA-54 MFW, including implementation of 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 preventive maintenance. They also address appropriate adjustments and/or replacements of devices, equipment, and systems. This approach allows for identification and correction of conditions that have the potential to cause breakdowns or failures that could result in the release of pollutants to the environment.

In selecting and citing constructed storm water controls and developing work procedures and practices for implementation at TA-54, N3B has considered measures to minimize impacts from events such as major storms and fires. Examples of such measures include intensive inspections for seasonal impacts (N3B-DOP-TRU-1420, "Seasonal Facility Preservation Plan Rounds") and work modifications for weather or other conditions. The following sections describe the storm water control measures in use at TA-54 MFW. Collectively, these measures are implemented to meet the permit's "non-numeric technology-based effluent limits" described in Part 2.1.2 of the 2021 MSGP.

3.1.1 Minimize Exposure

N3B recognizes that preventing storm water contact with pollutants is generally more effective and less costly than removal of pollutants from storm water; and the use of a combination of control measures is generally more effective at minimizing pollutants than a single control measure. These principles are applied throughout operations at TA-54 MFW.

Structural controls and practices used to minimize the exposure of material storage areas and industrial and maintenance 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 equivalent) or dispersant/bioremediation liquid product (e.g., MicroBlaze for stains) is performed.
- Procedures for material storage and handling (e.g., 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 are drained to prevent leaks.
- Equipment/vehicle repair and work areas are swept or vacuumed regularly.
- All dumpsters are covered or closed with lids when not in use.
- Lubricating fluids, cleaners, and other potential pollutants are properly stored.
- 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 to prevent exposure to storm water are implemented.
- Routine facility inspections (RFIs) and quarterly visual assessments (QVAs) ensure that this SWPPP is properly followed and that no potential contaminants are present in exposed areas as addressed in section 5.1, Routine Facility Inspections, and section 5.2, Quarterly Visual Assessment of Storm Water Discharges.
- Leaking vehicles and equipment staged on-site for repair are parked on impervious surfaces and under cover.
- Surface grading, berms, and curbs are used throughout the facility to prevent discharges of contaminated flows and to divert run-on from identified areas of potential contamination sources.
- Pesticide/herbicide use is coordinated with mechanical measures, such as cutting vegetation and using traps for pests, as an overall attempt to minimize the use of these chemical products. All pesticide/herbicide applications are conducted in accordance with manufacturer recommendations, and applications are minimized to prevent runoff of excess product.

3.1.2 Good Housekeeping

All areas of MFW are maintained in a clean and orderly state in accordance with good housekeeping practices intended to keep exposed areas of TA-54 MFW free of potential contributions to storm water pollutants. These practices include the following:

- Outside areas are routinely cleaned up.
- Active shop areas are swept daily.
- 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.
- Spills are immediately cleaned up with absorbent pads, biodegradable dry absorbents (i.e., 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 appropriately.
- Maintenance activities are conducted indoors or under cover, when possible.
- Sumps and catch basins are routinely inspected and 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) or in accordance with manufacturer specifications, whichever is lower.
- 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 of in accordance with the appropriate procedures.
- Chemical use, such as pesticides/herbicides and cleaning products, is minimized to the extent possible. When chemical products are used, they are applied in accordance with manufacturer guidelines and in a manner that minimizes broad distribution or liquid discharge.

3.1.3 Maintenance

At TA-54 MFW, operators perform preventive maintenance on all heavy equipment on a routine schedule in accordance with appropriate procedures. They also perform a pre-operation inspection on equipment before use. These inspections are intended to identify any maintenance issues or leaks that need to be remedied before becoming larger issues.

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.

The storm water PPT conducts quarterly routine facility inspections and quarterly visual assessments to assess the site conditions and the functionality of site storm water controls. Each type of inspection is discussed in section 5.0 of this SWPPP.

Repair, maintenance, or replacement of BMPs will be conducted immediately (i.e., the day of discovery or, if identified late in the day, the next day following discovery) if possible. If not completed immediately, reasonable steps will be taken to prevent the discharge of pollutants until the needed maintenance is completed. 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 N3B-SOP-RP-0005, “Radiological Emergency Response,” as appropriate. The following measures will be implemented as appropriate in the event of a spill or release:

- Spills/leaks will be cleaned up promptly using dry absorbents.
- Drip pans/absorbents will be strategically staged below any leaking equipment.
- Spill/overflow protection will be used.
- Stored containers will be labeled appropriately to identify contents.
- Secondary containment, barriers, and other measures will be used to prevent the discharge of pollutants from material storage and traffic areas.
- Spill response training will be provided to all appropriate personnel.
- Spill response kits appropriate to the materials stored will be maintained in the vicinity where spills are likely to occur.

The TA-54 Operations Center can be reached at 505-257-8400. If a fire or explosion occurs, 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 required at N3B: internal spill recordkeeping and 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 of the National Response Center, EPA Region 6, the New Mexico Environment Department (NMED), and/or nearby Pueblos, as appropriate.

3.1.5 Erosion, Sediment, and Storm Water Runoff Controls

Physical controls are in place throughout the site to minimize erosion, isolate storm water from potential pollutants, and manage sediment and storm water runoff from the site. Storm water controls are used on-site to divert, infiltrate, contain, or otherwise reduce storm water to minimize pollutants in discharges from the facility. Constructed storm water control measures in use at MFW include vegetative swales, culverts, eco blocks, and earthen berms. These features are illustrated on the site map provided as Attachment B.

3.1.6 Employee Training

All of the employees who are involved with the implementation of this SWPPP and the provisions of the 2021 MSGP are trained to understand the requirements of the permit and the contents of this SWPPP. As may be relevant to specific job function, annual training includes:

- An overview of this SWPPP;

- Spill response procedures, good housekeeping, maintenance requirements, and material management practices;
- The location of physical controls required by this permit and the required maintenance of those controls;
- Appropriate pollution prevention requirements;
- Inspection, documentation, and corrective action requirements of the 2021 MSGP; and
- Facility-specific emergency procedures.

3.1.7 Non-Storm Water Discharges

Evaluation of TA-54 MFW for non-storm water discharges that are not explicitly authorized by Part 1.2.2 of the 2021 MSGP is part of each routine facility inspection conducted in accordance with Section 5.0 of this SWPPP. In addition, as part of N3B's internal project review process, proposed operational and facility changes are evaluated for regulatory impacts, including any potential changes to the 2021 MSGP or this SWPPP.

3.1.8 Dust Generation and Vehicle Tracking of Industrial Materials

Controls implemented at TA-54 MFW to minimize the generation of dust and off-site tracking of raw, final, or waste materials debris include

- parking vehicles and equipment on impervious surfaces,
- minimizing off-road travel,
- covering the areas surrounding the TA-54 MFW with base course, and
- applying sparse amounts of potable water.

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 this industrial sector. As described above, 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 2021 MSGP Part 2.1.3.

3.4 Water Quality-Based Effluent Limitations and Water Quality Standards

Monitoring required by the 2021 MSGP for this facility includes sampling of storm water runoff for receiving water-specific impairment parameters. These parameters are identified by the New Mexico Environment Department (NMED) in the 2018–2020 State of New Mexico 303(d) List of Impaired Surface Waters as well as in the 2020–2022 State of New Mexico 303(d) List, which has been approved by the New Mexico Water Quality Control Commission and is pending approval by EPA. Details regarding this monitoring are provided in section 5.3 of this SWPPP. All available storm water data collected from this site is maintained in the publicly accessible Intellus database (<https://www.intellusnm.com/>). Reporting of monitoring results is provided electronically to EPA via the Central Data Exchange NetDMR website (<https://cdx.epa.gov/>).

4.0 Schedules and Procedures

4.1 Housekeeping

Pickup 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 regularly removed from the site for off-site disposal.

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 the condition of containers, tanks, and packaging.

Good housekeeping practices described in section 3.1.2 of this SWPPP 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. Any needed maintenance of control measures is conducted as soon as possible in order to minimize the potential for pollutant discharges. If not completed immediately (i.e., the day of discovery or, if identified late in the day, the day following discovery), reasonable steps will be taken to prevent the discharge of pollutants until the needed maintenance is completed. The condition of erosion and sediment controls, including areas of established vegetation in perimeter areas of the facility and non-structural controls (such as spill kits) will be routinely inspected and maintained in proper condition.

4.2 Equipment Maintenance

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

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

4.3 Employee Training

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 2021 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 2021 MSGP, monitoring results, control measures, and details of the SWPPP.

MSGP training records are documented in accordance with N3B's training organization. Training records are also maintained as part of this SWPPP.

5.0 Inspection and Monitoring Requirements

In accordance with the 2021 MSGP, inspections, assessments, and monitoring for indications of contaminants and potential issues or conditions of concern are routinely conducted at TA-54 MFW. These requirements are discussed in the following sections.

5.1 Routine Facility Inspections

RFIs will be conducted on a quarterly basis by the PPT lead or designee. The individual conducting each inspection will be knowledgeable in the principles and practices of industrial storm water controls and pollution prevention. This individual will also possess the education and ability to assess both the conditions at the industrial facility that could impact storm water quality and the effectiveness of the storm water controls in use to meet the requirements of the permit. Each RFI inspection will include visual assessments of storm water control measures used to comply with the 2021 MSGP and all facility areas where industrial materials or activities are exposed to storm water.

The PPT lead or designee performing the inspection will use the RFI work statement provided as Attachment D of this SWPPP to document each inspection. Prior to each RFI, the inspector will consider the results of visual and analytical monitoring for the prior year. The completed work statements will be signed by an authorized representative, and a copy of each work statement will be maintained in Attachment D of this plan.

Each RFI will be conducted during normal business hours. If possible, one RFI per year will 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 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;
- evidence of leaks or spills from industrial equipment, drums, tanks, or other containers;
- observations regarding the condition of the outfalls;
- any additional control measures needed to comply with the MSGP;
- any incidents of noncompliance observed; and
- for any needed maintenance or repairs identified, reasonable steps taken or determined necessary to reduce the potential of a discharge from the site.

Specific parts of the facility to be inspected include

- areas that are covered by the 2021 MSGP,
- areas where industrial materials or activities are exposed to storm water,
- areas identified as potential pollutant sources,
- locations where spills or leaks have been documented within the past three years,
- discharge points (including areas downstream of any discharge point that is inaccessible), and
- control measures used to comply with the 2021 MSGP.

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 Part 5 of the 2021 MSGP, section 7 of this SWPPP, and all applicable N3B procedures.

5.2 Quarterly Visual Assessment of Storm Water Discharges

QVAs will be conducted at the single outfall for TA-54 MFW, monitored outfall 049, in accordance with Part 3.2 of the 2021 MSGP and N3B-QP-RGC-0004, “MSGP Storm Water Visual Assessments.” The purpose of these assessments is to identify visible evidence of pollution in storm water discharge from the facility. Visible evidence of pollutants triggers the corrective action discussed in section 7 of this SWPPP.

Samples will be collected for each QVA in a manner that generates a sufficient volume of representative storm water from the monitored outfall.

Each QVA will

- involve the collection of a representative sample of a measurable discharge using a clean, clear glass or plastic sample container;
- be conducted on a sample collected during the first 30 min of discharge from a storm event. If the sample is not collected within the first 30 minutes, it must be collected as soon as practicable and the reason for any delay (e.g., adverse conditions, snowmelt, etc.) must be documented;
- 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 (e.g., because of adverse conditions or a no-precipitation event); and
- include an additional assessment during the next qualifying storm event if it cannot be performed during a particular quarter.

As allowed by Part 3.2.4.2 of the 2021 MSGP for climates with irregular storm water discharges (e.g., due to limited rainfall and/or freezing conditions), N3B proposes to conduct QVAs according to the following modified quarterly schedule:

Quarter	Modified Visual Assessment Schedule	
1	April 1	– May 31
2	June 1	– July 31
3	August 1	– September 30
4	October 1	– November 30

Each QVA will evaluate representative storm water discharge for potential pollutants by evaluating the following water quality characteristics:

- color,
- odor,
- clarity,
- floating solids,
- settled solids,
- suspended solids,
- foam,
- oil sheen, and/or
- other obvious indicators of storm water pollution.

Each visual assessment will be documented using N3B Form 6341, MSGP Storm Water Visual Assessment Form. Copies of each assessment shall be maintained within this SWPPP document.

5.3 Monitoring

Monitoring activities applicable to TA-54 MFW include impaired waters monitoring, indicator monitoring, and state-specific monitoring.

Analytical monitoring is performed on representative storm water discharge collected from the site via an automated sampler located at monitored outfall 049. Monitoring events occur from storm events that result in an actual discharge from the site and that follow the preceding measurable storm event by at least 72 hr. For runoff from snowmelt, the monitoring is performed when a measurable discharge from the site occurs.

Samples are analyzed in accordance with the analytical methods set forth in 40 Code of Federal Regulations Part 136, using test procedures with quantification limits that are sufficiently sensitive for the monitored parameter based on water quality criteria or screening level, as applicable. Runoff samples are collected within the first 30 min of a measurable storm event. If it is not possible to collect a representative sample within the first 30 min of a measurable storm event, the sample is collected as soon as practicable after the first 30 min and documentation is kept with the SWPPP explaining why it was not possible to take samples within the first 30 min. An MSGP sampling and analysis plan (SAP) is developed every year that identifies the current monitoring year, analytical requirements, analytical

methods, preservation requirements, volume requirements, types of shipping containers, type of sampler to be used, and holding times for each analysis.

5.3.1 Monitoring Schedule

Monitoring for compliance with the 2021 MSGP will be conducted on a modified schedule as allowed by Part 4.1.6 of the 2021 MSGP for facilities in climates with irregular storm water discharges. The modified monitoring schedule that will be implemented for this facility is summarized as follows:

Biannual Period	Quarter	Modified Monitoring Schedule		
1	1	April 1	–	May 31
	2	June 1	–	July 31
2	3	August 1	–	September 30
	4	October 1	–	November 30

Certain circumstances, such as a lack of qualifying storm events or imposition of a stop-work order by DOE, could prevent sample collection during one or more quarters. Such a situation will be documented as necessary and, as qualifying precipitation events allow, make-up samples will, if possible, be collected in the subsequent quarter.

Impaired-waters monitoring and NMED-required per- and polyfluoroalkyl substance (PFAS) sampling are performed on an annual basis. One sample is collected in the period between April 1 and November 30 of each CY, unless there is no qualifying storm event that results in a discharge from the facility, or another unanticipated circumstance prohibits the collection of a sample (such as issuance of a stop-work order by DOE). Indicator monitoring for polycyclic aromatic hydrocarbons (PAHs) is conducted biannually in the first and fourth years of permit coverage. If necessary, make up samples will be collected in subsequent biannual periods.

Current sampling requirements for MFW are summarized in Table 5.3-1.

**Table 5.3-1
TA-54 MFW MSGP Sampling Summary – Outfall 049**

Monitoring Requirement	Monitoring Frequency	Industrial Sector	Analyte ^a	Filtered/ Unfiltered ^b	Regulatory Standard/ Screening Level	Units	Regulatory Standard Reference
Impaired Waters	Annual	— ^c	Aluminum (total recoverable)	F10μ	660	μg/L	NM 2018 Aquatic Acute – hardness dependent
Impaired Waters	Annual	—	PCBs (Total Aroclors)	UF	2.0	μg/L	NM 2018 Aquatic Acute
Impaired Waters	Annual	—	Copper (dissolved)	F	4.35	μg/L	NM 2018 Aquatic Acute – hardness dependent
Impaired Waters	Annual	—	Gross Alpha (adjusted)	UF	15	pCi/L	NM 2018 Livestock Watering

Monitoring Requirement	Monitoring Frequency	Industrial Sector	Analyte ^a	Filtered/ Unfiltered ^b	Regulatory Standard/ Screening Level	Units	Regulatory Standard Reference
Impaired Waters	Annual	—	Cyanide (total recoverable)	UF	5.2	µg/L	NM 2018 Wildlife Habitat
State-Specific	Annual	—	PFAS	UF	0.070 ^d	µg/L	NMED 401 Cert/2021 MSGP Part 9.6.2.1
Indicator	Quarterly	P	pH	UF	NA ^e	---	2021 MSGP Part 4.2.1.1 a
Indicator	Quarterly	P	TSS	UF	NA	---	2021 MSGP Part 4.2.1.1 a
Indicator	Quarterly	P	COD	UF	NA	---	2021 MSGP Part 4.2.1.1 a
Indicator	Bi-annual	P	PAHs ^f	UF	NA	---	2021 MSGP Part 4.2.1.1 b Sector P

Notes: The regulatory standards for aluminum and copper are calculated using a hardness value of 30.2 mg/L for Pajarito Canyon.

^a PCBs = polychlorinated biphenyls; PFAS = per- and polyfluoroalkyl compounds; TSS = total suspended solids; COD = chemical oxygen demand; PAH = polycyclic aromatic hydrocarbons.

^b F = Filtered; F10µ = filtered using a 10-µm filter; UF = unfiltered.

^c — = Not applicable.

^d The combined results of PFOA + PFOS analytes will be compared to the New Mexico Screening Level of 0.070 µg/L.

^e NA = No threshold or regulatory standard applies to this parameter.

^f Monitoring is required for 16 individual PAH compounds identified in 40 CFR Part 243, Appendix A.

5.3.2 Monitoring Results

5.3.2.1 Impaired-Waters Monitoring

As required by Part 4.2.5 of the 2021 MSGP, monitoring will be conducted for any parameter identified as causing an impairment in the receiving water for that discharge. Impairments are based on the current State of New Mexico 303(d) list and updated each monitoring year in the MSGP SAP. Monitoring for impaired water parameters will be conducted annually in the first and fourth years of permit coverage, unless an impairment parameter is detected, in which case monitoring will be conducted each year. Any impairment parameter that is not detected will be excluded from annual monitoring until permit year 4. If it is determined that the presence of an impairment pollutant is caused solely by natural background sources, monitoring for that parameter will be discontinued, provided documentation specified by Part 4.2.5.1 of the 2021 MSGP is developed and maintained within the on-site SWPPP document.

5.3.2.2 Indicator Monitoring

Indicator monitoring for pH, TSS, and COD will be conducted quarterly for the 2021 MSGP permit term in accordance with Part 4.2.1.1.a of the 2021 MSGP. PAH compounds will be conducted bi-annually (twice each monitoring year) in the first and fourth years of permit coverage in accordance with Part 4.2.1.1.b of the 2021 MSGP. The results of all indicator monitoring are “report-only” and do not have thresholds or baseline values for comparison.

5.3.2.3 State-Specific Monitoring

Monitoring for PFAS is required by Part 9.6.2.1 of the 2021 MSGP. This monitoring will be conducted once during the first year of permit coverage. If monitoring indicates the presence of PFOA/PFOS

compounds reported as a single combined value above the New Mexico PFAS screening level of 0.070 µg/L, sampling will be repeated annually.

Prior to the beginning of each monitoring year (April 1), an MSGP sampling and analysis plan will be developed to define the all applicable monitoring requirements for this facility. This information will be updated annually in this SWPPP.

5.3.3 Recordkeeping

For each monitoring event, except snowmelt monitoring, the following information will be recorded and maintained through documentation provided on work orders, chain-of-custody forms, discharge monitoring records, and off-site analytical laboratory reports:

- Date, exact place, and time of sampling or measurements
- Date and duration (in hours) of the rainfall event
- Rainfall total (in inches) for that rainfall event
- Time (in days) since the previous measurable storm event
- Individual(s) who performed the sampling or measurements
- Date(s) analyses were performed
- Individual(s) who performed the analyses
- Analytical techniques or methods used
- Results of such analyses

For snowmelt monitoring, all information except rainfall event durations, totals, and time since previous event will be included.

All analytical data from monitoring storm water will be maintained in Intellus.

6.0 Documentation to Support Eligibility Considerations under Other Federal Laws

6.1 Documentation Regarding Endangered Species

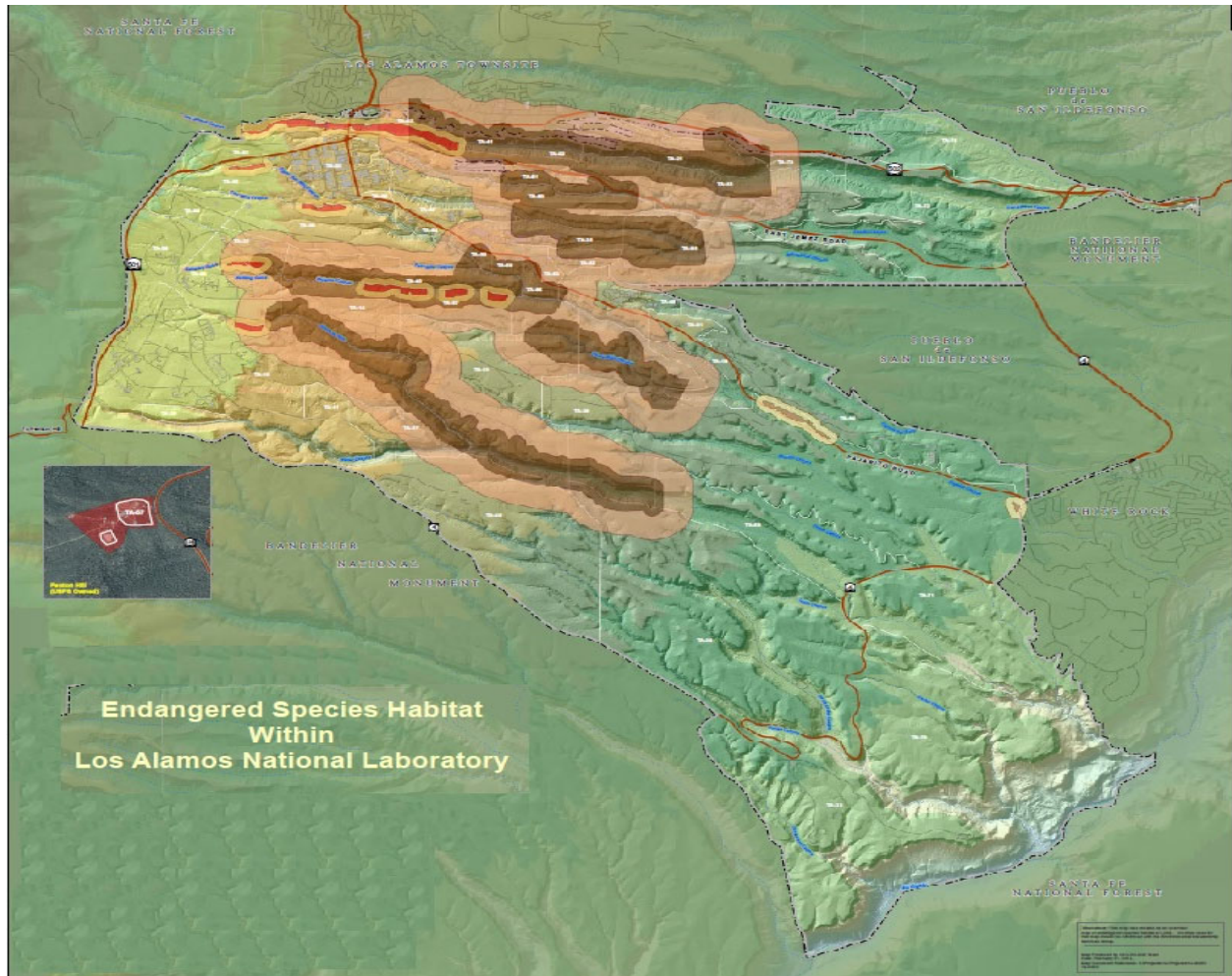
The LANL “Threatened and Endangered Species Habitat Management Plan for Los Alamos National Laboratory” (HMP) (<https://permalink.lanl.gov/object/tr?what=info:lanl-repo/lareport/LA-UR-15-28610>) was prepared to provide for the protection of federally listed threatened and endangered species and their 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 inhabit 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 an 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 for 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.lanl.gov/environment/protection/compliance/sweis.php>).

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 a 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 on 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 put 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 6-1 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 6.1-1.



Endangered Species Habitat
Within
Los Alamos National Laboratory

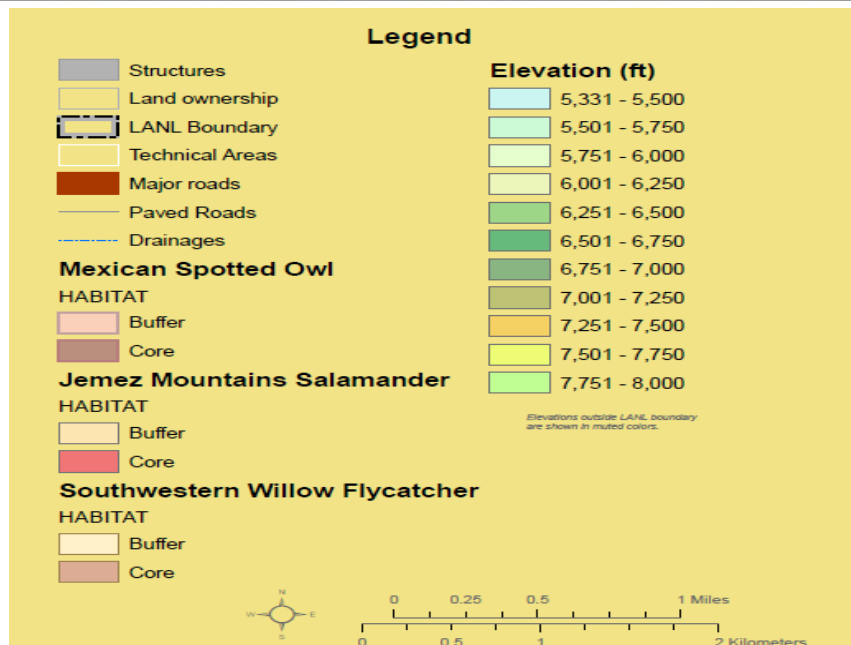


Figure 6.1-1 Endangered species habitat within LANL

6.2 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 2021 MSGP for effects on historic properties.

TA-54 MFW operations were found to pose no effect to historic properties 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.

7.0 Corrective Actions and Deadlines

7.1 SWPPP Review and Revision to Ensure Effluent Limits are Met

Discovery of any of the conditions described below will trigger a corrective action requiring review and revision of this document as determined necessary:

- An unauthorized release or discharge (e.g., a non-incident spill, leak, or discharge of non-storm water not authorized by this or any other NPDES permit to waters of the United States) that occurs at the facility.
- A discharge violates a numeric effluent and/or a sector-specific requirement identified in Part 8 of the 2021 MSGP.
- Storm water control measures are not stringent enough to control storm water discharge from the facility such that the receiving water will not meet applicable water quality standards.
- A required control measure was never installed, was installed incorrectly or was not installed in accordance with the requirements of Parts 2 and/or 8 of the 2021 MSGP.
- A required control measure is not operated or maintained properly.
- A visual assessment (i.e., QVA) shows evidence of storm water pollution (e.g. color, odor, floating solids, settled solids, suspended solids or foam is observed in an assessed sample).

7.2 Conditions Requiring SWPPP Review to Determine if Modifications Are Necessary

Construction at the facility, or a change in design, operation or maintenance that significantly changes the nature, type or quantity of pollutants discharged via storm water will require a review of the SWPPP and involved control measures to evaluate the adequacy of those measures to reduce pollutants.

7.3 Corrective Action Deadlines

All conditions subject to corrective actions will be documented in the N3B MSGP storm water database (MainConn) within 24 hours of discovery/occurrence. Where feasible, corrective actions will be implemented immediately (i.e., the day of discovery, or if identified late in the day, the day following discovery). If completion of corrective action is not feasible immediately, reasonable steps will be taken to prevent the discharge of pollutants until the needed correction is complete. In any case, the situation will be documented along with details to describe how the potential impacts from the condition will be minimized (such as with the installation of temporary controls, etc.). This documentation will include a signed and certified statement that complies with Appendix B, Subsection 11 of the 2021 MSGP. Within 14 days of initiation of the corrective action, documentation of how the condition was resolved will be prepared. If infeasible to complete the necessary corrective action within 14 days (or otherwise specified in the 2021 MSGP) the rationale and schedule for completion of the corrective action will be included in this documentation. If an extension from EPA is necessary to complete a corrective action, documentation including justification for that extension will be prepared and maintained in MainConn.

All modifications to the facility and or referenced procedures etc., including the installation or use of temporary measures, will be incorporated into this SWPPP.

8.0 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

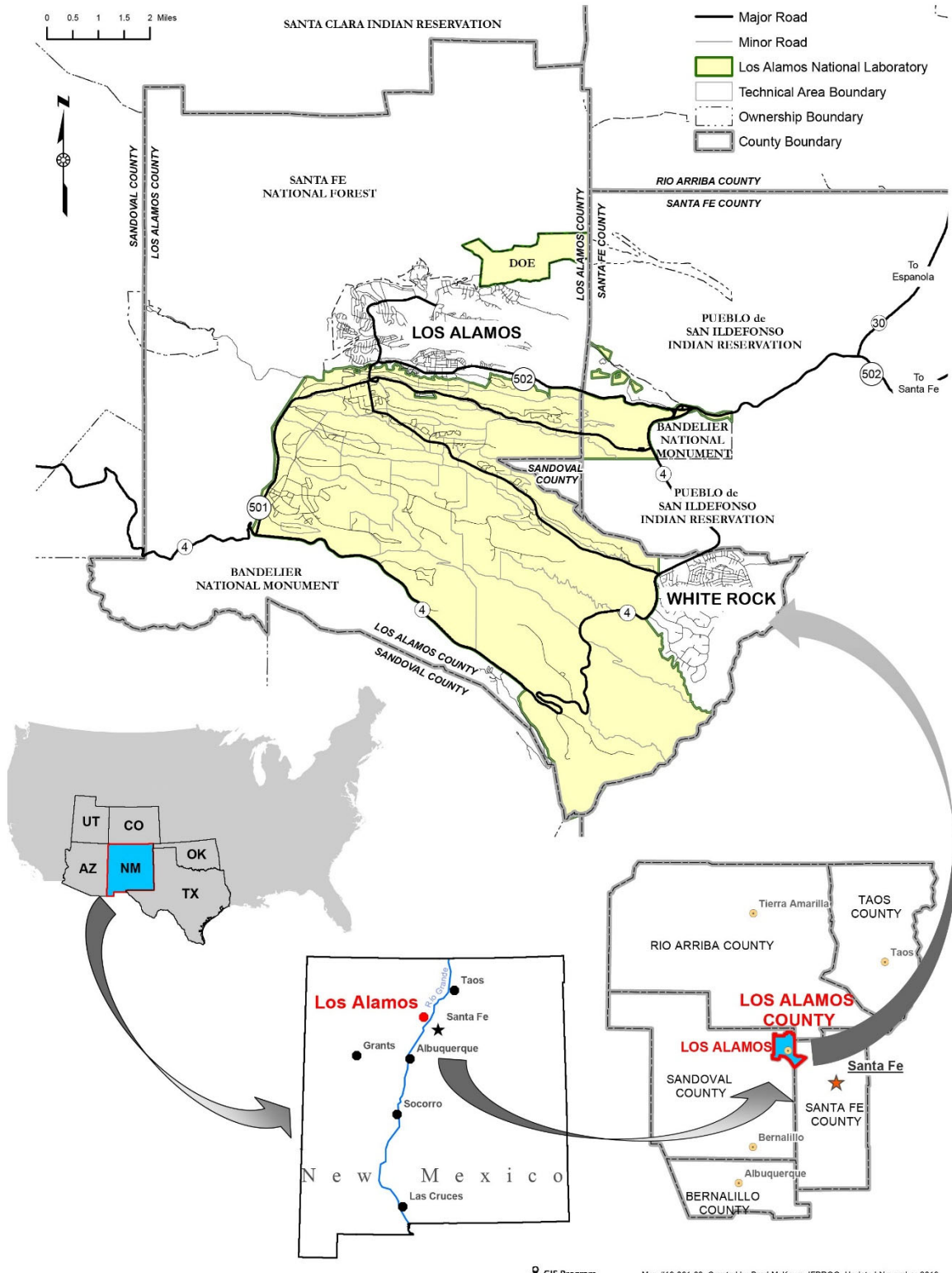
Signature: Emily Day
Digitally signed by Emily Day
Date: 2021.05.03 12:32:32
-06'00'

Date: _____

9.0 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 2021 MSGP. A record of all document modifications will be tracked using the form provided in Attachment F.

Attachment A General Location Map

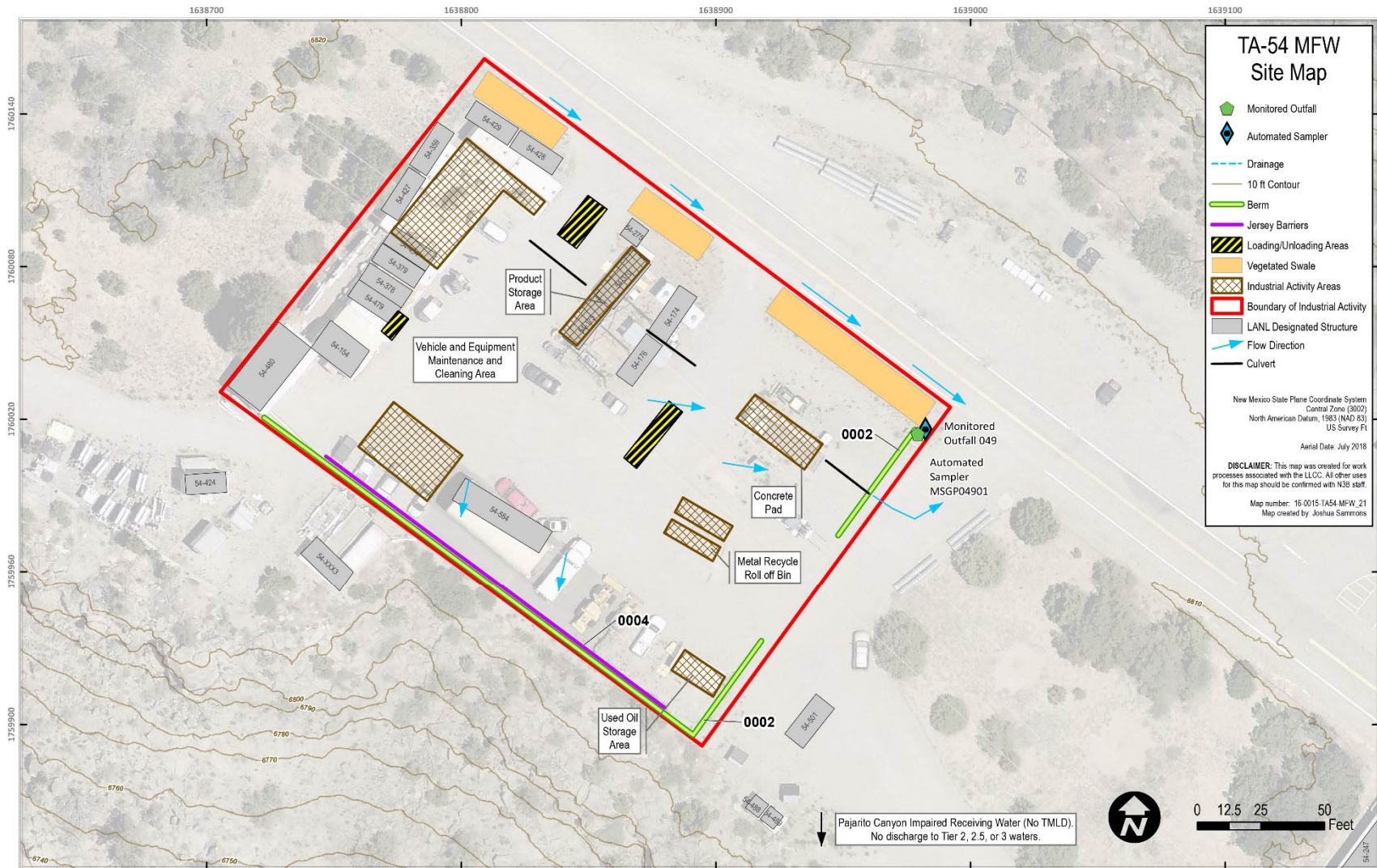


GIS Program

Map #19-061-08, Created by Brad McKown, IFPROG, Updated November 2019

Attachment B Site Map

TA-54 Maintenance Facility West Storm Water Pollution Prevention Plan



Attachment C Relevant Procedures

Number	Title
N3B-QP-RGC-0004,R0	MSGP Storm Water Visual Inspections
N3B-AOP-TRU-3003	Material Release or Spill
N3B-SOP-RP-0005	Radiological Emergency Response
N3B-SOP-ER-5016	Multi-Sector General Permit Storm Water Corrective Actions
N3B-SOP-ER-4001, Rev 0	Processing Surface Water Samples
N3B-SOP-ER-4004, Rev 0	Installing, Setting Up and Operating Automated Storm Water Samplers
N3B-SOP-ER-5004, Rev 0	Inspecting Automated Storm Water Samplers and Retrieving Samples
N3B-AP-ER-1002, Rev 0	Environmental Remediation (ER) Field Work Requirements

Attachment D Routine Facility Inspections Form and Report



Maintenance Details

Requested: 12/2/2019 12:04:15 AM

Target: 3/31/2020 (14) hrs

 MSGP TA 54

Phone:

Priority/Type: / Preventive

 RG249.5

Email:

 TA-54 MFW

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)

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.		<input type="checkbox"/>	<input type="checkbox"/>
Within the Facility Boundary				
40	Is the facility free of new discharges of pollutants that have occurred since the last inspection? If "No", describe:		<input type="checkbox"/>	<input type="checkbox"/>
50	If "No" has a CAR been previously initiated for this new discharge? (Range: 0 - 0)		<input type="checkbox"/>	<input type="checkbox"/>
60	Is the facility free of discharge of pollutants at the time of inspection? If "No" describe:		<input type="checkbox"/>	<input type="checkbox"/>
70	Is the facility free of evidence of, or the potential for, pollutants entering the drainage system. If "No" describe:		<input type="checkbox"/>	<input type="checkbox"/>
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)		<input type="checkbox"/>	<input type="checkbox"/>
100	Monitored Outfall [049] Flow Dissipation Devices Operating Effectively? (Range: 0 - 0)		<input type="checkbox"/>	<input type="checkbox"/>
110	Monitored Outfall [049] Free of evidence of pollutants in Discharges and/or Receiving Water? (Range: 0 - 0)		<input type="checkbox"/>	<input type="checkbox"/>
Control Measures (identify needed maintenance and repairs, failed control measures that need replacement, or a description of corrective actions in relevant task comments).				
130	Earthen Berm [5400403010002] Is control measure operating effectively? If "No" describe condition and need for maintenance, repair, or replacement.		<input type="checkbox"/>	<input type="checkbox"/>
140	Earthen Berm [5400403010003] Is control measure operating effectively? If "No" describe condition and need for maintenance, repair, or replacement.		<input type="checkbox"/>	<input type="checkbox"/>
150	Jersey Barriers [5400403170004] Is control measure operating effectively? If "No" describe condition and need for maintenance, repair, or replacement.		<input type="checkbox"/>	<input type="checkbox"/>
160	Vegetated Swale [5400404070001] Is control measure operating effectively? If "No" describe condition and need for maintenance, repair, or replacement.		<input type="checkbox"/>	<input type="checkbox"/>
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.		<input type="checkbox"/>	<input type="checkbox"/>
190	Produce/chemical storage areas (raw material): controls adequate (appropriate, effective, and operating)? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>
200	Liquid tank storage/secondary containment: controls adequate (appropriate, effective, and operating)? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>
210	Industrial processing and finished product storage areas: controls adequate (appropriate, effective, and operating)? If "No" describe.		<input type="checkbox"/>	<input type="checkbox"/>

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

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: _____ Z#: _____

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

Attachment E Quarterly Visual Inspection Form and Report



MSGP Storm Water Visual Assessment Form

INSTRUCTIONS: This form is to be used to document visual assessments of storm water for compliance with the Multi-Sector General Permit

Location ID:	Facility ID:	Assessment Date:
--------------	--------------	------------------

Weather:	Monitored Outfall or SIO?	Active Discharge?
----------	----------------------------------	-------------------

Was sample collected within 30 minutes of first discharge? If NO, document why:

SAMPLE ASSESSMENT: Describe the sample characteristics in each of the following categories

Color: Describe if necessary:	Odor: Describe if necessary:	Floating Solids: Describe if present:
----------------------------------	---------------------------------	--

Clarity:	Oil Sheen:	Suspended Solids:
----------	------------	-------------------

ALLOW SAMPLE TO SETTLE +/- 30 MINUTES

Settled Solids:
Describe if necessary:

GENTLY SHAKE

Foam:	Other Notable Characteristics:
-------	--------------------------------

Based on observed characteristics, indications of pollutants were / were not observed.

If indications of pollutants were observed in the assessed sample, notify N3B Regulatory Compliance and evaluate the surrounding area for possible contributing factors such as staining, poor housekeeping, compromised storm water controls etc. Note any relevant observations or information here:

CERTIFICATION: As required by Section 3.2.2 and Appendix B, Subsection 11 of the MSGP, this form must be signed and certified by a responsible corporate officer or a duly authorized representative of that person.

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

Employee Name:	Z#:
----------------	-----

Signature:	Date:
------------	-------

N3B-QP-RGC-0004, R0

MSGP Storm Water Visual Assessments

Effective Date: 3/10/2021

Next Review Date: 3/10/2024

Supersedes: EPC-CP-QP-064

Hazard Class: Low Moderate High/Complex
Usage Mode: Reference UET Both UET & Reference

The Responsible Manager has determined that the following organizations' review is required for initial procedure release as well as subsequent major revisions. Review documentation is contained in the Document History File.

Environmental Remediation CH-TRU
 Environment, Safety, and Health

Classification Review: Unclassified UCNI Classified

Nicole M. Vigil / 207718 / Signature on File / 1/28/2021

Name (Print) *Z#* *Signature* *Date*

Responsible Manager

Emily Day / 199090 / Signature on File / 3/9/2021

Regulatory Compliance Director *Z#* *Signature* *Date*

Working Copy / Information Only (circle one)

Initials / Date: _____ / _____

Reference

REVISION HISTORY

Document No./Revision No.	Effective Date	Action	Description
N3B-QP-RGC-0004, R0	3/10/2021	New	This document replaces blue sheeted EPC-CP-QP-064 for use in conducting MSGP storm water visual assessments

Reference

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
TITLE PAGE.....	1
CHANGE SUMMARY.....	2
TABLE OF CONTENTS	3
1.0 PURPOSE.....	4
2.0 SCOPE.....	4
3.0 REFERENCES	4
4.0 DEFINITIONS AND ACRONYMS.....	5
4.1 Definitions	5
4.2 Acronyms	6
5.0 RESPONSIBILITIES	6
5.1 CH-TRU Shift Operations Manager.....	6
5.2 CH-TRU Operations Staff (Environmental Professional).....	6
5.3 Regulatory Compliance Lead (Environmental Professional).....	7
6.0 PRECAUTIONS AND LIMITATIONS	8
7.0 PREREQUISITE ACTIONS.....	8
7.1 Training	8
7.2 Planning and Coordination	9
7.3 Performance Documents	10
7.4 Special Tools and Equipment, Parts, and Supplies	10
8.0 PERFORMANCE.....	11
8.1 Visual Assessment of Storm Water.....	11
8.2 Approvals and Notifications.....	12
9.0 RECORDS PROCESSING	12

Reference

1.0 PURPOSE

This procedure describes the process for conducting visual assessments of storm water from outfall locations monitored under the National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit (MSGP) for Industrial Facilities at Technical Area (TA)-54, Areas G, L and Maintenance Facility West (MFW). Visual assessments of storm water runoff for indications of potential pollutants are a compliance requirement of the 2015 MSGP. The monitored locations include discharge points (identified as monitored outfalls) and substantially identical outfalls (SIOs). The location, identification and visual assessment requirement for each monitored location is described in the site-specific Storm Water Pollution Prevention Plan (SWPPP) for each facility. This procedure should be used in conjunction with the applicable SWPPP to meet the requirements of the 2015 MSGP. Documentation of each visual assessment should be completed using N3B-Form-6341, *MSGP Storm Water Visual Assessment Form*. The MSGP requires that completed Storm Water Visual Assessment forms be maintained with the on-site copy of the applicable SWPPP. In addition, an electronic copy of each form should be maintained on Newport News Nuclear BWXT-Los Alamos, LLC (N3B)'s common electronic drive located: R:\RegulatoryCompliance\REGULATORY COMPLIANCE\Multi Sector General Permit\Visual Storm Water Assessment Forms.

Visual assessments of storm water discharge must be conducted from each monitored outfall/SIO at each MSGP facility in accordance with the schedule described herein.

2.0 SCOPE

Requirements set forth in this document apply to N3B-operated industrial facilities subject to coverage under the MSGP. Permit-covered areas include TA-54, Areas G and L, due to Hazardous Waste Treatment, Storage or Disposal Facilities (Sector K facility as defined by 2015 MSGP, Appendix D, Part 8) and MFW, due to Land Transportation and Warehousing (Sector P facility as defined by 2015 MSGP, Appendix D, Part 8).

This procedure applies to the N3B technical staff and subcontractor personnel (as applicable) who conduct storm water visual assessments during or after measurable storm events at MSGP outfalls, including monitored discharge locations and SIOs.

3.0 REFERENCES

N3B-SOP-ER-5016, *Multi-Sector General Permit Storm Water Corrective Actions*

CW-2020-5571, MSGP Annual Training for TA-54 Areas G and L and Maintenance Facility West

EM2019-0116, Storm Water Pollution Prevention Plan for Technical Area 54 Maintenance Facility West

EM2020-0403, Storm Water Pollution Prevention Plan for Technical Area 54 Areas G and L

Reference

4.0 DEFINITIONS AND ACRONYMS

4.1 Definitions

Adverse weather conditions—Weather that prohibits collection of samples such as local flooding, high winds, ice, hurricanes, tornadoes, electrical storms, etc. Could also include drought, extended frozen conditions, etc.

Best Management Practices (BMPs)—Schedules of activities, practices, prohibitions of practices, structures, vegetation, maintenance procedures, and other management practices employed to prevent or reduce pollution. BMPs can also include treatment requirements, operating procedures, and practices to control facility site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

Clarity—Clearness or cleanness of appearance. This includes the visual observation of suspended sediment.

Color—Unpolluted water will be clear and colorless. Color should not be confused with clarity.

Floating solids—Particulate material floating on the surface of the water.

Foam—An accumulation of fine frothy bubbles formed in or on the surface of water. A mass of bubbles of air in a matrix of liquid film.

Measurable storm event—A weather event that produces sufficient precipitation in the form of either rainfall or snowmelt, which results in an actual discharge at a monitored outfall or SIO following a period of at least 72 hours (3 days) during which no measurable precipitation occurred.

Odor—The property or quality of water that affects or stimulates the sense of smell. Examples of odors that may be present are burnt oil, petroleum hydrocarbon, sewage, diesel, sulfuric, or detergent odors.

Oil sheen—The presence of rainbow-like colors glistening on the surface of a liquid. The color of oil sheen will vary depending on thickness and consistency.

Settled solids—Settled particulate material i.e., heavier than water. Examples include sand, gravel, metal turnings, and glass.

Suspended solids—Particulate materials that are floating between the bottom of the sample and the surface of the water.

Reference

4.2 Acronyms

BMPs	Best management practices
CH-TRU	Contact Handled Transuranic Program
CA	Corrective action
IWD	Integrated work document
MFW	Maintenance Facility West
MSGP	Multi-Sector General Permit
N3B	Newport News Nuclear BWXT-Los Alamos, LLC
NPDES	National Pollutant Discharge Elimination System
TA	Technical area
SIOs	Substantially identical outfalls
SWPPP	Storm water pollution prevention plan

5.0 RESPONSIBILITIES

5.1 CH-TRU Shift Operations Manager

- **ENSURES** MSGP monitoring activities are on a standing plan of the day

5.2 CH-TRU Operations Staff (Environmental Professional)

- **ANTICIPATES** weather events with potential to produce an actual discharge.
- **REVIEWS** MSGP precipitation reports distributed by N3B personnel via email for recent rainfall events with 24-hour total and 30-minute intensity triggers indicated by outfall.
- **INSPECTS** monitored outfalls/SIOs for storm water discharge after each storm event resulting in a discharge. If possible, this inspection shall be conducted within 30 minutes of first discharge.
- **COLLECTS** grab sample of representative storm water discharge in a clean, colorless glass or plastic container within 30 minutes of first discharge of a measurable storm event. If not collected within 30 minutes, document why a storm water sample could not be collected within the first 30 minutes (e.g. discharge occurred outside of normal business hours, etc.).

Reference

- **ASSESSES** storm water samples for indications of pollutants, including odor, color, clarity, solids (floating, settled, suspended), foam, oil sheen etc.
- **DOCUMENTS** results of visual storm water assessment and other relevant information on N3B-Form-6341, *MSGP Storm Water Visual Assessment Form*.

NOTE: *In addition to recording the results of visual storm water assessments, N3B-Form-6341 shall be used to document why a storm water sample could not be collected within 30-minutes of first discharge.*

- **ATTEMPTS** to correlate any visual contamination indications identified by the visual storm water assessment to obvious pollutant sources in the vicinity of the discharge. Obvious potential contributions to storm water pollutants could include stored equipment, nearby ground staining, recent spills, compromised storm water controls, poor housekeeping or other conditions.
 - **DOCUMENTS** any findings pertaining to indications of storm water contamination on N3B-Form-6341, *MSGP Storm Water Visual Assessment Form*.
- **NOTIFIES** N3B Regulatory Compliance Lead of any indications of pollutants identified. Notification to Regulatory Compliance should occur as soon as possible following identification.
 - **PRESENTS** completed N3B-Form-6341, *MSGP Storm Water Visual Assessment Form* to delegated authority for certification.
- **RECORDS** completed copies of each N3B-Form-6341. One copy of each form shall be kept in the on-site copy of the corresponding SWPPP for that facility. An electronic copy of each completed form shall be placed in the shared electronic folder located at: R:/Regulatory Compliance/Regulatory Compliance/Multi Sector General Permit/Visual Storm Water Assessment Forms.

5.3 Regulatory Compliance Lead (Environmental Professional)

- **REVIEWS** completed N3B-Form-6341, *MSGP Storm Water Visual Assessment Form* for conditions requiring corrective action. Corrective actions (CAs) will be documented in N3B's Storm Water Database (Maintenance Connection) in accordance with the 2015 MSGP and N3B-SOP-ER-5016, *Multi-Sector General Permit Storm Water Corrective Actions*.
- **INITIATES** any required CAs in Maintenance Connection and confirms appropriate action is taken in response to any CAs issued.
- **PREPARES** annual reports of visual storm water assessments as required for the MSGP.

Reference

6.0 PRECAUTIONS AND LIMITATIONS

The following precautions and limitations generally apply to the work described in this procedure.

- Assessments shall be discontinued during periods or conditions that are potentially dangerous for worker safety or that prevent personnel from safely accessing sites (e.g., weather-related events such as flash floods, flooding, lightning, wildfires, hail, icy roads, deep snow, or certain facility operations).
- If a worker observes an unsafe condition or act that may pose an imminent danger or other safety concern/hazard, he/she has the authority and responsibility to pause or stop the work activity in accordance with N3B-P101-18, Procedure for Pause/Stop Work.
- PPE appropriate for entry to TA-54, including safety-toed shoes and safety glasses, is required of all personnel. In addition, high visibility vests are recommended during conditions of low visibility and “Yak Tracks” or equivalent are recommended during icy conditions.
- Vehicle use is anticipated to gain access to the areas subject to visual assessment. Personnel shall complete all necessary N3B vehicle safety training and conduct appropriate protocols (e.g. conduct 720 walk around, use chocks and cones, clear ice and snow from windshield as necessary) for vehicle use.
- Due to the nature of the assessments covered by this procedure, implementation will likely occur during periods of inclement weather. Personnel shall therefore plan accordingly and wear clothing appropriate for the conditions.
- Due to the remote nature of some areas involved with the implementation of this procedure, two person teams and two types of communication (e.g. phone and radio) is recommended.
- Do not disturb or touch wild animals, dead animals, nesting areas, droppings or surfaces with mold growth, if encountered.

7.0 PREREQUISITE ACTIONS

7.1 Training

CH-TRU Operations Staff (Environmental Professional)

- [1] **COMPLETE** MSGP Annual Training for TA-54 Areas G and L and Maintenance Facility West (CW-2020-5571 or most recent version). All N3B personnel and others involved with the visual assessment of storm water for compliance with the MSGP must have current documentation of completing this required training and also be familiar with this procedure and all relevant SWPPP(s).

Reference

7.2 Planning and Coordination

CH-TRU Operations Staff (Environmental Professional)

- [1] **ENSURE** that the performance of this procedure has been scheduled on the applicable facility (TA-54 Area G, Area L, Maintenance Facility West) Plan of the Day.
- [2] **ENSURE** that a pre-job briefing is conducted for all personnel involved in the performance of this procedure, in accordance with N3B-EP-DIV-AP-10, EWMO Pre-Job Briefing.
- [3] **MONITOR** weather forecasts and/or MSGP precipitation email reports sent by N3B staff for indications of sufficient rainfall to generate a storm water discharge. Based on historical precipitation monitoring, 24-hour totals and 30-minute intensity triggers determined at rain gage RG249.5 are useful to predict runoff at each monitored outfall and associated SIOs. Trigger totals for each monitoring point are summarized as follows:

TA-54 Area	Outfall ID	MSGP 24 Hour Precipitation Trigger (inches)	MSGP 30 Minute Intensity Trigger (inches)
MFW	Monitored outfall 049	0.28	0.14
Area L	Monitored outfall 050	0.05	0.01
Area G	Monitored outfall 051 and SIO 052	0.28	0.14
Area G	Monitored outfall 053 and SIOs 065 and 066	0.5	0.25
Area G	Monitored outfall 069 and SIOs 054, 055, 056, 057, 058, 059, 060, 061, 062, 063, 064, 067, 068	0.05	0.01
Area G	Monitored outfall 072 and SIO 070 and 071	0.5	0.25

- [4] **DETERMINE** which monitored outfalls/SIOs require monitoring. Each outfall/SIO shall be monitored by visual assessment at least once during each of the following monitoring periods:

Monitoring Quarter	Beginning	Ending
Q1	April 1	May 31
Q2	June 1	July 31
Q3	August 1	September 30
Q4	October 1	November 30

Reference

NOTE: *In the event that visual assessment is not completed for an outfall/SIO in a given quarterly monitoring period, the reason(s) (e.g. no discharge, adverse conditions, etc.) shall be documented on N3B-Form-6341, MSGP Storm Water Visual Assessment Form.*

- [5] **GATHER** all necessary paperwork, materials, equipment, personal protective equipment (see Section 7.4 below).

7.3 Performance Documents

CH-TRU Operations Staff (Environmental Professional)

- [1] **ENSURE** that the following documents are available, as required:
- Current SWPPP(s)
 - Site Map(s) which depict the monitored outfall and SIO locations
 - Blank or electronic N3B-Form-6341, *MSGP Storm Water Visual Assessment Form*

7.4 Special Tools and Equipment, Parts, and Supplies

CH-TRU Operations Staff (Environmental Professional)

- [1] **ENSURE** that the following equipment is available in the field vehicle:
- Safety glasses with side shields
 - Nitrile gloves
 - Sturdy, steel-toed boots with anti-slip soles appropriate for wet surfaces and additional traction cleats (Yak Trak or equivalent) if icy conditions exist.
 - A copy of this procedure, IWDs, site map, N3B-Form-6341
 - Keys required for access
 - Paper Towels
 - Replacement sample bottles (clear glass or plastic)

Reference

8.0 PERFORMANCE

8.1 Visual Assessment of Storm Water

CH-TRU Operations Staff (Environmental Professional)

- [1] **ACCESS** each monitored location as necessary. Stay on established walkways and avoid walking on uneven or unstable surfaces. Be observant of surroundings and potential obstructions (e.g. extension cords, etc.)
- [2] **COLLECT** a grab sample of discharge from a storm event using a clean, clear plastic or glass bottle. Wipe off exterior of the sample container for optimal viewing.

NOTE: *Grab samples shall be collected during daylight hours in a wide mouth clear glass bottle or plastic container. If not collected within the first 30 minutes of discharge from a storm event, it shall be collected as soon as practicable and documented on N3B-Form-6341, MSGP Storm Water Visual Assessment Form why it was not possible to collect the sample within the first 30 minutes of actual discharge. In the case of snowmelt, samples must be taken during a period with a measurable discharge.*

- [3] **ASSESS** collected grab sample for indications of:
 - Color
 - Odor
 - Clarity
 - Floating Solids
 - Suspended Solids
 - Oil Sheen
 - Other indications of potential pollutants
- [4] **WAIT** approximately 30 minutes to allow solids in collected sample to settle out. Document observations pertaining to settled solids.
- [5] **SHAKE** collected sample gently and assess for presence of foam.
- [6] **DOCUMENT** findings of visual assessment of the grab sample on N3B-Form-6341, *MSGP Storm Water Visual Assessment Form*.

Reference

- [7] **COMPLETE** all additional information on N3B-Form-6341, including outfall ID, field inspector name and signature, monitoring period, date, discharge time and duration, etc.
- [8] **ASSESS** areas surrounding the sampled discharge point for potential contributions of pollutants. Document any findings on N3B-Form-6341.

8.2 Approvals and Notifications

CH-TRU Operations Staff (Environmental Professional)

- [1] **NOTIFY** N3B Regulatory Compliance Lead immediately if any indications of pollutants are identified by the visual assessment of storm water.
- [2] **OBTAIN** certification and signature from an authorized representative in accordance with the current NPDES delegation of authority.
- [3] **PLACE** one copy of each completed N3B-Form-6341, *MSGP Storm Water Visual Assessment Form* in the appropriate section of the corresponding on-site version of the site-specific SWPPP. An electronic copy of the completed N3B MSGP Storm Water Visual Assessment form shall be placed on the shared directory located at:

R:\REGULATORY COMPLIANCE\Multi Sector General Permit\Visual Storm Water Assessment Forms

Regulatory Compliance Lead (Environmental Professional)

- [1] **INITIATE** corrective action to address any indications of pollution identified by the visual assessment of storm water. Corrective actions will be documented and tracked using the Maintenance Connection database in accordance with N3B-SOP-ER-5016, *Multi-Sector General Permit Storm Water Corrective Actions*.
- [2] **COMPILE** completed N3B-Form-6341 for each monitored outfall/SIO for each monitored period.
- [3] **PREPARE** an annual report in accordance with the requirements of the MSGP.

9.0 RECORDS PROCESSING

CH-TRU Operations Staff (Environmental Professional)

- Ensure that records generated by the performance of this procedure are protected and processed as follows:

Reference

- An electronic version of the completed N3B-Form-6341 shall be placed in the shared directory located at: R:\REGULATORY COMPLIANCE\Multi Sector General Permit\Visual Storm Water Assessment Forms
- A paper copy of the completed N3B-Form-6341 shall be placed in the appropriate section of the corresponding on-site version of the site-specific SWPPP.
- Records must be maintained for a period of at least three years from the date that MSGP permit coverage expires or is terminated.
- When the records are no longer needed for current business, transfer all records to N3B Records Management custody according to N3B-P1020-1, *N3B Records Management*.

Record Identification	Record Type Determination	Protection/Storage Methods
<p>N3B-Form-6341, <i>MSGP Storm Water Visual Assessment Form</i></p> <p>Note: Quality Assurance (QA) documents shall be considered valid records only if stamped, initialed, or signed and dated by authorized personnel or otherwise authenticated. Corrections to documents shall be reviewed and approved by the responsible individual from the originating or authorized organization.</p>	<p>Quality Assurance (QA) Record</p> <p>Nonpermanent</p> <p>Note: Nonpermanent QA Records provide evidence that an activity was performed in accordance with applicable requirements, but do not meet the criteria for Lifetime Records.</p>	<p>Supervision shall ensure the records are managed, maintained and stored according to NQA-1 2008/2009a requirements:</p> <ul style="list-style-type: none"> ▪ Limit access to the processing, storage, and retrieval of records to authorized personnel. ▪ Provide for the temporary storage of QA records in a cabinet with 1-hour fire rating, unless dual storage requirements are met. ▪ Provide for the long-term storage (single storage) of QA records in a cabinet with a minimum 2-hour fire rating unless dual storage requirements are met.

Attachment F SWPPP Modifications

Name And Number	Date of Revision	History of Revision

Attachment G Reference Documents



Date: July 2, 2020

N3B-2020-0232

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 Representatives 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:

- Jeff Holland, Regulatory and Stakeholder Interface Program Manager (acting)
- Kim Lebak, Environmental Remediation (ER) Program Manager
- Joseph Murdock, Environment, Safety and Health 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 or need additional information, please contact Jennifer von Rohr at (505) 695-4365 (jennifer.vonrohr@em-la.doe.gov).

Sincerely,



Glenn Morgan
President

EL:jv

cc: (letter emailed)

Laurie King, EPA Region 6
Chris Catechis, NMED-DOE-OB
Steve Yanicak, NMED-DOE-OB
M. Lee Bishop, EM-LA
Arturo Duran, EM-LA
Stephen Hoffman, EM-LA
Kirk D. Lachman, EM-LA
David Nickless, EM-LA
Cheryl Rodriguez, EM-LA
Ben Underwood, EM-LA
William Alexander, N3B
Donald Carlson, N3B
Emily Day, N3B
Michael Erickson, N3B
Mary Erwin, N3B
Thomas Harrison, N3B
Debby Holgerson, N3B
Jeff Holland, N3B
Kim Lebak, N3B
Joseph Legare, N3B
Dana Lindsay, N3B
Frazer Lockhart, N3B
Elizabeth Lowes, N3B
Pamela Maestas, N3B

Christian Maupin, N3B
Jeremiah McLaughlin, N3B
Jason Moore, N3B
Glenn Morgan, N3B
Joseph Murdock, N3B
Joseph Noll, N3B
Gerald O'Leary III, N3B
William O'Neill, N3B
Bruce Robinson, N3B
Troy Thompson, N3B
Steve Veenis, N3B
Tashia Vigil, N3B
Jennifer von Rohr, N3B
Amanda White, N3B
emla.docs@em.doe.gov
n3brecords@em-la.doe.gov
PRS Website

Pamela T. Maestas

From: Maguire, Charles <maguire.charles@epa.gov>
Sent: Thursday, July 2, 2020 11:53 AM
To: Pamela T. Maestas
Cc: Regulatory Documentation; Jahan, Nasim; Jennifer Von Rohr; Emily M. Day; Larsen, Brent; Martinez, Maria; Hayes, Mark
Subject: RE: Submittal to EPA on 7/2/2020 of CWA and NPDES Delegated Authorities

Receipt acknowledged and I will forward to my division staff.

From: Pamela T. Maestas <pamela.maestas@em-la.doe.gov>
Sent: Thursday, July 2, 2020 11:25 AM
To: Maguire, Charles <maguire.charles@epa.gov>
Cc: Regulatory Documentation <RegDocs@EM-LA.DOE.GOV>; Jahan, Nasim <Jahan.Nasim@epa.gov>; Jennifer Von Rohr <Jennifer.VonRohr@EM-LA.DOE.GOV>; Emily M. Day <Emily.Day@em-la.doe.gov>
Subject: Submittal to EPA on 7/2/2020 of CWA and NPDES Delegated Authorities

Mr. Maguire,

Attached for submittal is a pdf of the following:

- Delegation of Authorized Representatives for the Clean Water Act and National Pollutant Discharge Elimination System Individual Permit (N3B-2020-0232)

Please acknowledge receipt of this submittal by responding to this email.

Let me know if you have any questions.

Thank you.

Pamela T. Maestas

Regulatory Documentation Manager

Newport News Nuclear BWXT-Los Alamos, LLC

c. 505-927-7882

regdocs@em-la.doe.gov



1200 Trinity Drive, Suite 150
Los Alamos, NM 87544