



U.S. DEPARTMENT OF  
**ENERGY**

OFFICE OF  
**ENVIRONMENTAL  
MANAGEMENT**



## 2020 Storm Water Season

*Amanda White – Acting Program Manager for  
Monitoring and Compliance*



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- Partial stop-work order for U.S. Department of Energy Environmental Management's Los Alamos Field Office (EM-LA) except for Essential Mission Critical Activities (EMCA) on March 24, 2020
- U.S. Environmental Protection Agency (EPA) issued letter to all governmental and private sector partners on March 26, 2020
  - COVID-19 implications for EPA's Enforcement and Compliance Assurance Program
  - Entities should make every effort to comply with their environmental compliance obligations
  - If compliance is not reasonably practicable, facilities with environmental compliance obligations should:
    - a. Act responsibly under the circumstances in order to minimize the effects and duration of any noncompliance caused by COVID-19;
    - b. Identify the specific nature and dates of the noncompliance;
    - c. Identify how COVID-19 was the cause of the noncompliance, and the decisions and actions taken in response, including best efforts to comply and steps taken to come into compliance at the earliest opportunity;
    - d. Return to compliance as soon as possible; and
    - e. Document the information, action, or condition specified in a. through d.





- Letter from DOE EM-LA sent to EPA on April 17, 2020
  - Notification of force majeure and anticipated noncompliance due to partial stop-work order for activities under National Pollutant Discharge Elimination System (NPDES) Permit Number NM0030759
    - a. Storm water samplers will not be activated per our traditional, self-imposed target date of April 1 for approximately 129 site monitoring areas (SMAs); therefore site monitoring areas (SMA) sampling directed by Part I.D. of the Individual Permit will not initially be conducted.
    - b. Control measures and storm water management devices at any site affected by a storm rain event will not be inspected as directed by Part I.G.2 of the Individual Permit.





- Letter from DOE EM-LA sent to EPA on July 22, 2020
  - Notification of resumption of operations for activities under National Pollutant Discharge Elimination System Permit Number NM0030759
    - a. Resumption of N3B's operations at LANL will occur in phases, starting with additional mission critical activities that are both high priority and low risk.
    - b. Based on current State of New Mexico-imposed restrictions and N3B's DOE-approved Resumption of Operations Plan (ROP), the permittees are working toward achieving normal operations in the coming weeks.
    - c. Although subject to change, N3B anticipates resumption of Individual Permit requirements by August 15, 2020.
- All IP samplers were activated and all Best Management Practice (BMP) inspections from storm events during EMCA status were performed by August 31, 2020





# BMP Inspections Summary

Storm Event Date	Max intensity (in/hr)	# of Inspections Required	Force Majeure in effect?	Delay (days)
19-Mar	0.25	9	N	-
25-May	0.42	17	Y	48-79
29-May	0.26	14	Y	65-78
14-Jun	0.37	45	Y	27-57
23-Jun	0.42	29	Y	41-49
25-Jun	0.27	0 (previous rain)	N	-
4-Jul	0.52	0 (previous rain)	N	-
5-Jul	0.37	53	Y	8-13
18-Jul	0.60	0 (previous rain)	N	-
27-Jul	0.39	49	N	-
28-Jul	0.40	4	Y	13
1-Aug	0.55	29	N	-
2-Aug	0.54	14	Y	3-9
27-Aug	0.27	29	N	-
28-Aug	0.43	59	N	-
29-Aug	0.73	29	N	-
	Total	380		

Essential Mission Critical Activities Status

Phase 1 of N3B's Resumption of Operations Plan





- Five rain events during EMCA status potentially impacted 64 SMAs:
  - Fifty-five of these SMAs had rain events after EMCA: we can infer that samples from rain events during EMCA would not have been collected based on the fact that they did not trigger during similar or more intense rain events after EMCA.
  - Nine of these SMAs had no rain events after EMCA: given the fact that they have not historically sampled over the performance period of their monitoring stage(s), it is unlikely that samples would have been collected during EMCA.
  - Most likely, no samples would have been collected during EMCA status.
- One sample collected on August 29 at R-SMA-2.05
- Side note: very minimal streamflow and only four samples in upper Sandia Canyon would have been collected for gaging station network (upper Sandia Canyon watershed consists mostly of TA-3).





# Los Alamos is in Exceptional Drought

The U.S. Drought Monitor (USDM) is a map that shows the location and intensity of drought across the country. The data is updated each Tuesday and released on Thursday. This map shows the drought conditions on October 06, 2020.

### Learn more about the US Drought Monitor



#### D0 - Abnormally Dry

- Short-term dryness slowing planting, growth of crops
- Some lingering water deficits
- Pastures or crops not fully recovered

**0.1%** of State    **100.0%** D0-D4



#### D1 - Moderate Drought

- Some damage to crops, pastures
- Some water shortages developing
- Voluntary water-use restrictions requested

**23.6%** of State    **99.9%** D1-D4



#### D2 - Severe Drought

- Crop or pasture loss likely
- Water shortages common
- Water restrictions imposed

**31.3%** of State    **76.3%** D2-D4



#### D3 - Extreme Drought

- Major crop/pasture losses
- Widespread water shortages or restrictions

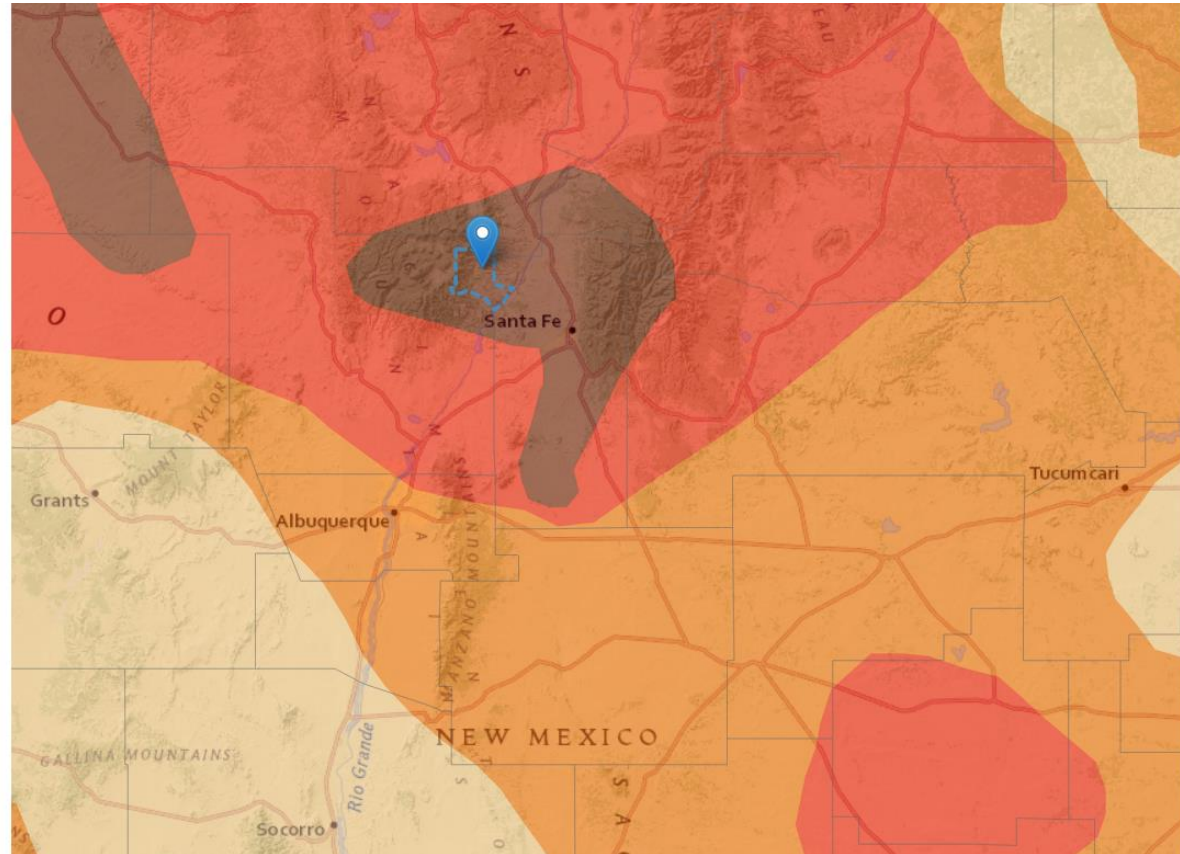
**38.2%** of State    **45.0%** D3-D4



#### D4 - Exceptional Drought

- Exceptional and widespread crop/pasture losses
- Shortages of water creating water emergencies

**6.8%** of State





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# Questions?



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