**NORTHERN NEW MEXICO CITIZENS' ADVISORY BOARD (NNMCAB)**
**Recommendation to the Department of Energy**
**Environmental Monitoring, Remediation and Surveillance Committee**

**No. 2008-03**
**Recommendation for Actions Regarding the EPA Stormwater Discharge Permit**

## Background

The U.S. Environmental Protection Agency (EPA) regulates Stormwater discharge at Los Alamos National Laboratory (LANL). A new draft Permit covering the next five years has been issued by the EPA.

National Pollution Discharge Elimination System (NPDES) Permit NM0030759 authorizes the discharge of storm water associated with Solid Waste Management Units (SWMUs) and Areas of Concern (AOC) from the facility located at Los Alamos to receiving waters named: tributaries or main channels of Mortandad Canyon, Canada del Buey, Los Alamos Canyon, Sandia Canyon, Ten Site Canyon, Canon de Valle, or Water Canyon, in Water Body Segment No. 20.6.4.126 or 20.6.4.128 of the Rio Grande Basin,

The permit covers 283 SWMUs and AOC, and 179 site-monitoring areas are assigned for monitoring of storm water discharges from those SWMUs and AOC.

## Comments and Observations

This permit is a continuation of ongoing work at LANL. The proposed permit uses a Best Management Practices (BMPs) approach to control and, to the extent achievable, eliminate the exposure of pollutants to the environment. The proposed permit requires applicable BMPs be installed at all Sites. The monitoring requirements established in the proposed permit are used to confirm the effectiveness of BMPs. If after two (2) installations of enhanced BMPs, the discharge from a specific Site still exceeds applicable Water Quality Criteria (WQC), the permittee must take actions to remove the source of pollutants, eliminate exposure of pollutants to the environment, or retain runoff from discharges.

Since major drinking water supply areas (Santa Fe Buckman Wells, San Idelfonso Pueblo, some Los Alamos County public supply wells) are downstream of possible stormwater events, it is imperative to restrict pollution being spread by water runoff. Damage caused to watershed areas by the 2000 Cerro Grande fire may enhance the extent of stormwater runoff, making good stormwater control methods even more important.

While the permit rigorously applies methods and measurements to control/monitor stormwater, the NNMCAB would like to see some general guidelines apply to storm water control/monitoring.

**Recommendation**

1. LANL will follow the precepts of the EPA Permit. The NNMCAB feels that the following points should be implemented, even if not included in the EPA permit.
2. Best Management Practices states, "you must select, design, install and implement the best available control measures economically achievable." This could imply that the best or even a good solution might not be implemented because of cost. The NNMCAB recommends that in every case, DOE/LANL should apply a remedy that will meet or exceed the permit specifications.
3. The NNMCAB recommends that cost estimates be prepared and provided for the implementation of the new permit requirements including all new BMPs, etc. A schedule for implementation of these measures will require coordination with future budgets. The NNMCAB would like to understand and comment on priorities for implementation of this program.
4. Reports on measurements are required twice a year. If it is not already required in the permit, the NNMCAB recommends that DOE/LANL should immediately notify the EPA whenever the measurements specified below in a) and b) are measured and not wait for the designated 6-month reporting time.
    a. Measurements greater than the applicable Maximum Target Level (MTL) or;
    b. the average of all applicable sampling results is greater than applicable Average Target Level (ATL).

**Intent**

The intent of this recommendation is to prevent any pollutant located at LANL from spreading via stormwater discharge.

**Reference**

National Pollutant Discharge Elimination System (NPDES) Draft Permit NM0030759. (http://www.epa.gov/earth1r6/6wq/npdes/publicnotices/nm/nmdraft.htm)