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Multi-Sector General Permit 2018 Annual Reports, National Technology & Engineering Solutions of Sandia (Permit No. NMR053122)

National Technology & Engineering Solutions of Sandia, LLC

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From: donotreply@epa.gov
To: donotreply@epa.gov
Subject: [EXTERNAL] EPA Multi-Sector General Permit (MSGP) Forms Certified
Date: Thursday, January 17, 2019 2:48:16 PM
Attachments: [cors.zip](#)

2019-01-17

Dear NeT User,

Jaime Moya successfully certified the following forms under the MSGP General Permit NMR050000:

NPDES ID	Form Type	Operator	Facility Name	Year	Review Date Target End
NMR053122	Annual Report	NATIONAL TECHNOLOGY AND ENGINEERING SOLUTIONS OF SANDIA, LLC	NATIONAL TECHNOLOGY AND ENGINEERING SOLUTIONS OF SANDIA, LLC	2018	n/a

The submission is contained in the attached zip file.

If you have questions about this email or about NeT MSGP, please refer to the NeT Help Center at <https://epanet.zendesk.com/hc/en-us/categories/202566467> or e-mail NPDESereporting@epa.gov for assistance.

This is an automated notification; please do not reply to this email.



Permit Information

Report Year: 2018

NPDES ID: NMR053122

Facility Information

Facility Name: NATIONAL TECHNOLOGY AND ENGINEERING SOLUTIONS OF SANDIA, LLC

Facility Point of Contact

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ZIP/Postal Code: 87185 State: NM

County or Similar Division: BERNALILLO

General Findings

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

For detailed descriptions of the 22 sites at Sandia National Laboratories (SNL) permitted under the MSGP in 2018, refer to the SNL Stormwater Pollution Prevention Plan (SWPPP) viewable at http://digitalrepository.unm.edu/snl_msgpp/. In August 2018, 2 of the 22 sites were approved and certified through an internal assessment process to be ineligible for MSGP coverage based primarily on the determination that manufacturing and waste streams do not have the potential to come into contact with precipitation or stormwater runoff. Three additional sites were removed from permit coverage in August following approval under the hazardous waste facility permit, leaving 17 sites eligible for coverage under the MSGP from August through December. Refer to Appendix E of the SNL SWPPP for details, viewable at http://digitalrepository.unm.edu/snl_msgpp/. No significant findings were identified on the removed sites while still covered under the permit in 2018. Findings as a result of site inspections were identified at 10 sites, with a total of 15 findings. Eight findings were considered minor -i.e.: a BMP or improvement but not clearly noncompliant or the finding was corrected the same day. Seven of the findings were considered significant -i.e.: noncompliant or potentially noncompliant. None of the findings described in this section resulted in a reportable corrective action as required in Parts 4.1 and 4.2 of the MSGP. Significant findings are extracted from the Excel tracking sheet and outlined below:

Advanced Mfg. Processes Laboratory (AMPL), Outfall SWSP 05. Rusted pressure tank and rusted metal workbench must be removed from the ground -secondary containment or under cover. In addition, clean-up of organic debris and trash in the south lot and reduction of materials and equipment stored outside, including under overhang area, is strongly recommended. Inspection date 11/28/18. No action as of 12/12/18.

Fleet Services, Outfall SWSP 05, Tires, discarded vehicle body on ground NE quadrant of site. Batteries no cover/secondary containment. Inspection date 3/22/18. 3/29/18 -all removed, batteries under cover.

Fleet Services, Outfall SWSP 05, Machinery with fluids outdoors need secondary containment or cover. Trash, oil and other debris needs clean-up. Inspection date 7/27/18. Clean-up was completed by 9/26/18.

Long Sled Track (SWMU 83), Outfall SWSP 17. Industrial materials exposed to stormwater. In progress since 2016. TA III Clean-up Campaign has Removed large industrial materials disposed on site e.g.: large concrete culverts, large wood and metal items, old machinery, rocket shipping containers, discarded vehicles, other materials. Completed by 9/14/18.

Reapplication Yard. Outfall SWSP 41. Stormwater runoff from site is causing erosion, gulying and sediment transport to stormwater drop inlet. Inspection date 3/28/18. Collaboration with site manager and Facilities on design and installation of substantial control measures. Project elevated to inclusion in Facilities FY 2019 budget.

Short Sled Track (SWMU 240), Outfall SWSP 240. Industrial materials exposed to stormwater. In progress since 2016. Estimated 90% completion by 9/14/18. TA III Clean-up Campaign is in process of removing large industrial materials disposed on site including very large concrete targets, concrete piles, asphalt pile, airplane parts, other debris. As of 9/14/18 all removed except large concrete targets, large concrete debris, pile of asphalt. Disposal path for these last materials from this SWMU is in planning phase.

Thermal Treatment Unit (TTU), Outfall SWSP 48. Sediment moving off site and collecting around stormwater sampler location. (No evidence of other pollutant discharge or for stormwater discharge and sediment to reach WOTUS or WONM.) Inspection Date 2/22/18. Design for control measures completed November 2018. Installation is on hold pending funding. Meetings through-out 2018 with site owner, Facilities, Hazardous Waste Permit Program Lead, to develop design that will not impact RCRA surface-soil sampling locations.

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

Visual Assessment Results indicate relatively clean stormwater discharges from sites permitted under the MSGP at SNL in 2018. Across all 22 sites (with 5 of those 22 sites no longer eligible after July 2018 -details are included in Section 1, Inspection Documentation, above), there were no indications of pollutants other than sediment. No discoloration, odor, oil sheens, foam, or Other pollutant indicators were identified in any visual assessments conducted in 2018.

Indicators of sediments and organics in stormwater runoff ranged from clear to moderate in the following range for concentration: 1) Clear, 2) Light, 3) Moderate, 4) Heavy, 5) Very Heavy. No 4's or 5's were recorded for these indicators. As would be expected, most of the higher values - i.e. "3's", were recorded for runoff from the most intense storm event of the season that occurred in July, when up to 1.72 inches of rain fell in 1.5 hours. That would exceed a 1/25yr event based on NOAA Point Precipitation Frequency Estimates for the SNL location. Potential for sediment in stormwater runoff to reach waters of the United States (WOTUS) or waters of New Mexico (WONM) occurred on one site only; the Reapplication Yard. The engineered design for erosion controls have been completed for this site and installation of controls has been scheduled in the 2019 Facilities budget.

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

Two benchmark exceedances occurred at one site during the 2018 monitoring periods: At the Classified Waste Landfill (CIWL) outfall (SW SP 08), permitted under Sectors L1 and L2, analytical results for two parameters in the July 2018 monitoring period exceeded the EPA applicable benchmark value. For Fe (at 10.8 mg/L) and TSS (at 1990 mg/L), the July 2018 values exceeded more than four times the benchmark value. The storm event exceeded a 1/25 yr. event based on the NOAA Point Precipitation Frequency Estimates for the SNL location. However, the visual assessment for this storm event indicated a clean stormwater discharge with a value of "0" for all indicators (see Section I I, Visual Assessment Results, above for details). In addition, no evidence of heavy runoff or sediment transport was observed during site inspections conducted in that period. The very high TSS and Fe values suggests anomalous, non-representative laboratory results. As Best Management Practices (BMP), a Corrective Action Report was completed and certified and a 20 ft. fiber roll was installed around the southwest corner of the site. Due to a lack of runoff and insufficient volume in the collection vessel in subsequent precipitation events through the remainder of the monitoring periods in 2018, no additional samples could be collected for analysis.

The CIWL site is characterized by minimal to no runoff, where only three samples have been collected since October 2015 due to insufficient flow. The exceedances at the CIWL poses no immediate potential for discharge of pollutants to receiving waters because current 12-digit maps show the CIWL to be located within the boundary of Closed Basin HUC 130202030403. Currently, the NMED Surface Water Quality Bureau recognizes the same location within the 8-digit map which shows drainage to unnamed playa lakes located ca. 4.5 miles southwest of the KAFB boundary where potential to discharge from this site to WOTUS or WONM is also very low.

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

Two MSGP Corrective Action Reports were completed in 2018:

- 1) As a BMP, the benchmark exceedances at the CIWL (Outfall SWSP 08) described in Section 3 above, were documented in a Corrective Action Report. Data provided in Section 3 indicate anomalous, non-representative analytical results. In addition, there was arguably no potential for discharge of pollutants to WOTUS or WONM. As a BMP, a 20 ft. fiber roll was installed around the southwest corner of the landfill where stormwater discharges from the site.
- 2) A cooling tower release occurred at Building 890; an SNL site that is not and has never been determined to be eligible for coverage under the 2015 MSGP. Cause of release was a clogged strainer that was corrected immediately. Although 50 gallons of coolant water entered the storm drain, the discharge did not reach the Tijeras Arroyo diversion channel or other WOTUS or WONM. The cooling water contained approximately 0.113 ppm concentration of scale inhibitor, 5.0 to 10.0 ppm concentration of bromide, and 0.1 to 0.3 ppm concentration of sodium hypochlorite. As a corrective action to minimize future clogs, weekly scheduled checks of all cooling tower strainer screens and distributor supply pans was incorporated into the SNL Facilities' "Routes and Rounds Schedule".

Certification Information

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

Certified By: Jaime L. Mbya (JLMOYASNL)

Certified On: 01/17/2019 4:47 PM