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National Technology & Engineering Solutions of Sandia, LLC

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From: donotreply@epa.gov
To: donotreply@epa.gov
Subject: [EXTERNAL] EPA NeT MSGP Annual Report Form Certified: NATIONAL TECHNOLOGY AND ENGINEERING SOLUTIONS OF SANDIA, LLC - NPDES ID: NMR053122
Date: Thursday, January 23, 2020 10:08:34 AM

2020-01-23

Dear NeT User,

Johnathon Huff successfully certified the following forms under the MSGP:

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	2019	n/a

A copy of the submission can be found [here](#).

If you have questions about this email or about the NPDES eReporting Tool Multi Sector General Permit (NeT MSGP) for Stormwater Discharges Associated with Industrial Activity, please refer to the [NeT Help Center](#) or e-mail NPDESereporting@epa.gov for assistance.

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



Permit Information

Report Year: 2019

NPDES ID: NMR053122

Facility Information

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

Facility Point of Contact

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Facility Mailing Address

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City: ALBUQUERQUE

ZIP/Postal Code: 87123

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 18 sites at Sandia National Laboratories/New Mexico (SNL/NM) permitted under the MSGP in 2019, refer to the SNL/NM Stormwater Pollution Prevention Plan (SWPPP) viewable at http://digitalrepository.unm.edu/snl_msgp/. Findings as a result of site inspections were identified at 5 sites, with a total of 9 findings, 5 of which were considered minor. Minor findings consisted of un-marked materials or equipment on the ground that contained oil, grease or potential refrigerants and that were moved under cover or on secondary containment on the same day or before a follow-up inspection was conducted within 3 days. Four 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 outlined below:

Advanced Mfg. Processes Laboratory (AMPL), Outfall SWSP 05: Materials exposed to stormwater and poor housekeeping, including prolonged exposure to stormwater of rusting materials, along with over-all outdoor equipment clutter, accumulated trash and organic debris. Rusted materials were removed on August 19, 2019 and general housekeeping also occurred at this time, resulting in a cleaner and more orderly site. Refer to the 8/1/2019 routine inspection report and 8/27/2019 follow-up inspection report.

Fleet Services, Outfall SWSP 05: Fifty-five-gallon closed container full of grease on ground surface was identified in the 11/15/19 routine inspection and was moved to secondary containment within three days and before predicted rainfall.

Reapplication Yard (Building 996), Outfall SWSP 41: On-going condition of stormwater runoff causing off-site erosion. The 996 Erosion Control Project, designed to address these erosional conditions, was elevated as a priority in 2018 and was put out to bid in November 2019. Project start is anticipated in early 2020.

Short Sled Track (SWMU 240), Outfall SWSP 240: Industrial materials exposed to stormwater: Extensive clean-up of legacy industrial materials occurred in 2018 through early 2019. The only remaining materials at this time consist of very large concrete targets. A disposal path for these last materials from this SWMU is in the planning phase.

Thermal Treatment Unit (TTU), Outfall SWSP 48: Sediment is moving off-site and collecting around the stormwater sampler location. Meetings occurred throughout 2018 with the Stormwater Program, TTU site owner, Facilities, and the Hazardous Waste Permit Program; to develop an erosion control design that would not impact RCRA surface-soil sampling locations. Design for control measures was completed and approved by NMED by end of CY 2018. In 2019 the erosion control project was put on-hold due to funding issues. Site condition at the TTU is not considered a corrective condition due to the location of the TTU within the Closed Basin HUC 130202030403, based on the 12-digit map. Currently, the NMED Surface Water Quality Bureau only recognizes the 8-digit map that shows potential, albeit low, for stormwater to reach waters of the U.S. (WOTUS), via several miles of overland flow. Potential for stormwater runoff to reach WOTUS from the TTU is considered minimal to none regardless of HUC delineation. In any case, efforts by the TTU and the SW Program to find funding for this erosion control project will continue because of the impacts that the sediment transport and erosion have on test operations and on stormwater sample collection from the site outfall.

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

Visual assessment results across outfalls in 2019 indicated higher levels of sediment and lower clarity when compared to previous visual results in this permit term (since October 2015). One incident of a petroleum odor was documented on the visual assessment form from the Hazardous Waste Handling Unit sample (SWSP 40) out of the catchment basin but no oil sheen or other evidence to substantiate this odor could be found. No additional odors, oil sheen, foam or other pollutants were identified in the visual assessments.

Only three of the outfalls where visual assessments indicated an increase in sediment discharge have potential to reach WOTUS in a pre-empted storm event: The Reapplication Yard, STENT 11 (MSP2), and Solid Waste Collection and Recycle Center. Stormwater discharge from only one of these sites; The Reapplication Yard (SWSP 41), has been observed reaching a "first receiving waters" to WOTUS. (Refer to the erosion controls project described in the previous section that is designed to mitigate erosion caused by stormwater runoff from the Reapplication Yard.) Erosion control rock bags have been installed at this site as a temporary best management practice (BMP) until the more extensive engineered controls of the "996 Erosion Control Project" can be installed. The remaining two sites are undergoing evaluation to assess BMPs that would slow the flow of stormwater discharges off these sites and decrease sediment transport in the event of a historical high storm event.

The number of storm events that resulted in sufficient runoff for sample collection was significantly lower in the 2019 wet season compared to the 2018 wet season. The following is an analysis summary of a data sub-set that exemplifies the dryer conditions in 2019: Comparing on-site meteorological (Met) data between 2019 and 2018 wet seasons (July 1 through October 31) from one SNL/NM Met Tower (A21) indicates longer antecedent dry periods between sample collections in 2019 as well as higher temperatures. More extreme low temperatures in the 2019 wet season resulted in a similar average temperature for both 2018 and 2019 but similarities end there. In 2019 there were less than half (43%) the number of significant storm events (separated by > 24 hours and with over a half inch of accumulation) than in 2018. Precipitation total for the 2019 wet season was just over a third (36%) of the total precipitation for 2018. In 2019, temperatures rose above 90° F nearly twice as often (1.8 times, based on 15-minute interval temperature readings) as in 2018. The longer dry spells and hotter temperatures in 2019 likely contributed to increased sediment movement (first-flush following a dry period has been shown to carry greater amounts of sediment and organic debris) at the MSGP outfalls, where runoff is characterized by overland flow and sparse, arid-land vegetation.

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.

N/A: There were no "four-sample-average benchmark exceedances" that occurred at any of the sample locations at the permitted sites with the exception of magnesium where values fell within natural background levels as presented in Appendix I of SWPPP viewable at http://digitalrepository.unm.edu/snl_msgp/.

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.

No corrective actions resulted from analytical data results, routine site inspections or visual assessments completed at sites permitted under the MSGP at SNL/NM in 2019. No corrective actions resulted in modifications to the SNL/NM SWPPP as required under Part 5.3 of the Permit.

One non-MSGP release did occur: A cooling tower release occurred at Building 899A which is a SNL/NM site that is not determined to be eligible for coverage under the 2015 MSGP. The release occurred on June 26, 2019. The release was identified and contained within 20 minutes. Cause of the release was a clogged strainer. Approximately 50 gallons of coolant water entered the storm drain but the discharge did not reach the Tijeras Arroyo diversion channel or other WOTUS. 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, this site was added to the weekly scheduled checks of cooling tower strainer screens and distributor supply pans as part of the SNL/NM 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 have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Certified By: Johnathon Huff

Certifier Title: Director, ES&H

Certifier Email: jhuff@sandia.gov

Certified On: 01/23/2020 12:05 PM ET