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Multi-Sector General Permit 2017 Annual Report, Department of Energy/Sandia Field Office (Permit Number NMR053114)

National Technology & Engineering Solutions of Sandia, LLC

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Subject: [EXTERNAL] EPA Multi-Sector General Permit (MSGP) Annual Report Accepted – Sandia National Laboratories, NPDES ID: NMR053114, NeT Submission ID: MSGP-AR-17081
Date: Wednesday, January 24, 2018 3:09:55 PM
Attachments: [AcceptedNewAnnualReportReceipt.pdf](#)

2018-01-24

Your EPA Multi-Sector General Permit (MSGP) Annual Report submitted for Sandia National Laboratories, 1515 Eubank Blvd SE Albuquerque NM 87123, for NPDES ID NMR053114, has been accepted by the EPA.

Attached to this email, you will find a copy of your completed Annual Report form. To access your Annual Report in NeT, please visit: https://cdx.epa.gov/epa_home.asp.

If you have questions about this email or about NeT, please call the EPA NOI Processing Center at 1-866-352-7755 (toll free) or send an email to noi@avanticorporation.com. If you have questions regarding the MSGP, please contact EPA at rachel@avanticorporation.com; nonnie@avanticorporation.com; connor@avanticorporation.com; zach@avanticorporation.com; farris.erika@epa.gov; nguyen.helen@epa.gov; emily@avanticorporation.com; julie@avanticorporation.com; paola@avanticorporation.com; jahan.nasim@epa.gov.

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2015 NPDES Multi-Sector General Permit For Stormwater Discharges Associated With Industrial Activity (MSGP) Forms

United States Environmental Protection Agency
1200 Pennsylvania Ave, NW Washington, DC 20460

Permit Information (* indicates form required data)

What action would you like to take? *

New Industrial Stormwater Annual Report

Please select the NPDES ID corresponding to the facility for which you would like to submit an Annual Report and click the Submit button.

NPDES ID *

NMR053114: DOE Sandia Field Office

Confirm NPDES ID: NMR053114: DOE Sandia Field Office *

Facility Information

Facility Name

Sandia National Laboratories

Street

1515 Eubank Blvd SE

Supplemental address

City

Albuquerque

State

New Mexico

Zip Code

87123

First Name

Karen

Middle Name

L

Last Name

Agogino

Telephone Number

5058456100

Summary of past year's inspections, assessments, and corrective actions

1. 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 airfield pavement deicers containing urea (e.g., "I certify that [name of airport] is in compliance with the effluent limitation guideline for airfield pavement deicing by not using airfield pavement deicers that contain urea."). [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, refer to the SNL Stormwater Pollution Prevention Plan (SWPPP) viewable at http://digitalrepository.unm.edu/snl_msgp/. Three of the 22 sites had findings identified during the 2017 Routine Site Inspections. Findings (i.e., requiring new or modified control measures) identified on the three sites are summarized below. The findings described in this section did not result in reportable corrective actions as required in Parts 4.1 and 4.2 of the MSGP:

The Short Sled Track, Solid Waste Management Unit (SWMU) 240: Industrial debris from previous testing activities have been identified at the south end of SWMU 240. In August 2016, the "TA III Group 1530 Clean-up Campaign NEPA NM16-0283" was initiated which included plans for removal of industrial materials from SWMU 240, where allowable under RCRA requirements. The SNL Stormwater Program is currently working with this Clean-up Campaign to meet MSGP compliance at SWMU 240.

TA V Sandlot: Following identification of erosion at this Hazardous Waste Management Unit during routine site inspections in 2016, SNL Facilities Operations installed substantial erosion control features around the perimeter of the site to prevent discharge of stormwater run-off. Installation was completed on October 26, 2017.

The Thermal Treatment Unit (TTU): Sediment eroding off the perimeter berm of the TTU was identified during routine site inspections in 2017. Erosion controls were installed in 2015 and stabilization of de-vegetated areas around the site occurred in 2016 (refer to SNL MSGP Annual Report for Calendar Year 2016). Currently additional controls on or around the berm are being discussed with the DOE and NMED HWB to determine a path forward that will meet both EPA Stormwater and RCRA compliance.

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

Visual assessments are conducted at 16 outfalls permitted under the MSGP at SNL. For details on visual assessment procedures and documentation, refer to the SNL SWPPP. The visual assessment observations reflect a monitoring season (MSGP monitoring season is defined by the wet season from July through October) at SNL characterized by above average temperatures and below average precipitation. July was the wettest month during the monitoring season but still fell below the 20-year Mean. October was the driest month in this period with only 0.07 inches of precipitation; more than 90% below the October average. June, the normally dry month preceding our wet season set up more than average dry antecedent conditions with only 0.06" rain compared to the 20-year Mean of 0.49 inches along with higher-than-average high temperatures. Intensity values calculated for storm events in the 2017 wet season indicated less-intense storm events preceded by long dry periods. The very dry conditions are reflected by the number of outfalls that received no discharge through the four-month monitoring season: 63% of possible collection events (assuming one event per site per monitoring period) received no discharge.

No pollutants such as oil, foam or unusual odors, were identified during any of the visual assessments. There were no sites where significant sedimentation or erosion occurred beyond the site outfall or reached waters of the U.S. (WOTUS) or Waters of New Mexico (WONM). Most of the samples from outfalls where discharge did occur showed clean to light sediments - likely a result of less intense rainfall compared to previous monsoon seasons. Four sites discharged moderate to heavy sediments and organics to the sampler. The Surface Discharge Site, SWMU 502, was the only site that had more than one visual assessment in 2017 that indicated moderate to heavy sediments and this may account for the slight exceedance for arsenic at this site as reported in Section 3 below. The TTU site was also one of the four outfalls that received moderate to heavy sediments. These assessment results support observations made during the Routine Site Inspections, as reported in Section 1 above where plans for erosion control at this site are summarized. The third site where sediments were moderate to heavy was the TA V Sandlot. This assessment was conducted before the erosion controls were completed at the site, which are reported in Section 1 above. The fourth site where significant sediment was observed in the sample was the Manzano Storage Bunkers (MSBs). Based on Routine Site Inspections and analytical results, there is no potential for discharge of sediments or other pollutants in stormwater runoff beyond site boundaries of the MSBs.

3. 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. *

At the Surface Discharge Site (SWMU 502), the average of sample values for arsenic (As) from the most recent four consecutive sample collections is 0.0112 mg/L which is slightly above the 0.0100 mg/L applicable SNL/ NM benchmark value for that parameter.

Based on 1) evidence supporting a natural source of As, 2) the small margin of exceedance for this parameter and, 3) the low potential for discharge to receiving waters at SWMU 502*, the best management practices to address this exceedance are: 1) continued monitoring and analysis of stormwater data from SWMU 502, including visual assessments as a tool to observe sediments in samples, 2) assessment of As data in soil, groundwater and stormwater samples to determine if As qualifies as a natural background metal and should be added to Appendix I of the SNL MSGP SWPPP; "Background Levels of Constituents in Stormwater Runoff" and 3) assessment of the best method(s) for quantifying sediment in stormwater samples that would allow comparisons of sediment concentrations to metals concentrations. Details for this exceedance and how it is being addressed is documented in a Corrective Action Report filed with the SNL SWPPP.

*Current 12-digit maps show SWMU 502 to be located within the boundary of Closed Basin HUC 130202030403. The hydrologic unit code (HUC) system was developed by USGS. A "Closed Basin" HU is defined as a drainage area that is 100 percent non-contributing; all surface flow is internal and no overland flow leaves the HU through the outlet point such that it would contribute surface flow to a stream or river.

4. 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. *

There were no Corrective Actions resulting from Routine Site Inspections or Visual Assessments completed for permitted sites at SNL in 2017. There were no spills, leaks or other dry weather releases reportable to NMED in 2017 or that met the conditions for a Corrective Action under the MSGP and the SNL SWPPP. Upgrades as a result of the cooling tower leaks reported in the Annual Report for CY 2016 successfully mitigated the equipment failure conditions that led to those past releases, as evidenced by the absence of spills and leaks in this 2017 calendar year.

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 gather and evaluate 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. 40 CFR 122.22 (d)

Certifier E-Mail *

jeffrey.harrell@nnsa.doe.gov

Form Action *

Approve