NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

February 21, 2012

Mr. Kevin W. Smith, Manager
U.S. DOE National Nuclear Security Administration
Los Alamos Site Office MS A316
3747 West Jemez Road
Los Alamos, New Mexico 87544

Mr. Michael Brandt, Associate Director
Environment, Safety, Health and Quality MS K491
Los Alamos National Security, LLC
P.O. Box 1663
Los Alamos, New Mexico 87545

RE: Minor Non-Municipal, SIC 9711, NPDES Compliance Evaluation Inspection, USDOE and LANS / Los Alamos National Laboratory, NM0030759, January 31, 2012 - February 3, 2012

Dear Mr. Smith and Mr. Brandt:

Enclosed, please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during this inspection are discussed in the Further Explanations section of the inspection report. You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify in writing, both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Diana McDonald
US Environmental Protection Agency
Allied Bank Tower
Region VI Enforcement Branch (6EN-WM)
1445 Ross Avenue
Dallas, Texas 75202-2733

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

I especially appreciate the cooperation of Terrill W. Lemke, other LANS, and LASO staff during the inspection. If you have any questions about this inspection report, please contact me at (505) 827-0418.

Sincerely,

/s/ Erin S. Trujillo
Erin S. Trujillo
Surface Water Quality Bureau

cc: Marcia Gail Adams, USEPA (6EN-AS) by e-mail
Samuel Tates, EPA (6EN-AS) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Diana McDonald, USEPA (6EN-WM) by e-mail
Sonia Hall and Hannah Branning, USEPA (6EN-WC) by e-mail
Larry Giglio, USEPA (6WQ-PP) by e-mail
Robert Italiano, NMED District II Manager by e-mail
Terrill W. Lemke, Water Quality & RCRA Group, LANL (ENV-RCRA) by e-mail

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	2	3	11	12	17	18	19	20
Transaction Code	NPDES		yr/mo/day			Inspec. Type	Inspector	Fac Type
N	5	NM0003075	9	120131		C	S	4

Remarks: NATIONAL REASEARCH LABORATORY

67	69	70	71	72	73	74	75	80
Inspection Work Days		Facility Evaluation Rating	BI	QA	Reserved			
		4	N	N			MINOR	

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
Los Alamos National Laboratory (LANL), Los Alamos County, New Mexico. LANL is jointly operated by the U.S. Department of Energy (DOE), National Nuclear Security Administration (NNSA), Los Alamos Site Office (LASO) and Los Alamos National Security, LLC (LANS).

Entry Time /Date: 0900 hours / 01/31/2012
Exit Time/Date: 1300 hours / 02/03/2012
Permit Effective Date: November 1, 2010
Permit Expiration Date: March 31, 2014

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
-Terrill Lemke, PE, CPESC, CISEC, LANL Storm Water Permitting/Compliance Team Leader, Water Quality & RCRA Group (ENV-RCRA), LANS / 505-665-2397, cell 505-699-0725
-Cathy Hayes, Sam Loftin, & Jeff Walterscheid, LANL (ENV-RCRA), LANS
-Jackie Little, LANL Environmental Communication & Public Involvement, LANS
-Armand Groffman, Monitoring Lead and Sofia Windard, LANL (EP-E&T), LANS
-Gene E. Turner, Environmental Permitting Manager, Env. Projects Office, LASO / 505-667-5794

Other Facility Data
SIC 9711, 9661, and 9611

Name, Address of Responsible Official/Title/Phone and Fax Number
-Mr. Kevin W. Smith, Manager, National Nuclear Security Administration, Los Alamos Site Office MS A316, 3747 West Jemez Road, Los Alamos, NM 87544 / 505-667-6691
-Mr. Michael Brandt, Associate Director, Environment, Safety, Health and Quality MS K491, Los Alamos National Security, LLC, P.O. Box 1663, Los Alamos, New Mexico 87545

Contacted: Yes [ ] No [*]

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

M	Permit	N	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	M	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
M	Effluent/Receiving Waters	S	Laboratory	S	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. **SEE ATTACHED CHECKLIST REPORT AND FURTHER EXPLANATIONS, INCLUDING ATTACHED COMMENTS ON SITE MONITORING AREAS.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Erin S. Trujillo */s/ Erin S. Trujillo*	**NMED/SWQB/505-827-0418**	**02/21/2012**
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Richard E. Powell */s/ Richard E. Powell*	**NMED/SWQB/505-827-2798**	**02/21/2012**

Los Alamos National Laboratory – Individual Stormwater – 01/31/2012	PERMIT NO. NM0030759

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ☐ S ☒ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED* ***Yes***)

DETAILS: **No outfalls (discharge points), rather permit identifies Site Monitoring Areas (SMAs)**

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	☒ Y ☐ N ☐ NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	☐ Y ☐ N ☒ NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	☐ Y ☐ N ☒ NA
4. ALL DISCHARGES ARE PERMITTED	☒ Y ☐ N ☐ NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ☐ S ☒ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED* ***Yes***)

DETAILS: **2010 DMRs. 2011 DMRs (not due as of date of this inspection). See further explanations for Site Discharge Pollution Prevention Plan (SDPPP) and other reports. Reviewed records for 2M-SMA-1.44 and W-SMA-5.**

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. **2010 Annual Report**	☒ Y ☐ N ☐ NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	☐ S ☒ M ☐ U ☐ NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	☒ Y ☐ N ☐ NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	☒ Y ☐ N ☐ NA
c) ANALYTICAL METHODS AND TECHNIQUES.	☒ Y ☐ N ☐ NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	☒ Y ☐ N ☐ NA
e) DATES AND TIMES OF ANALYSES. **contract laboratory certificates of analysis = Yes** **contract laboratory inorganics analysis data package for metals = No**	☐ Y ☒ N ☐ NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	☒ Y ☐ N ☐ NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	☒ S ☐ M ☐ U ☐ NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.	☒ S ☐ M ☐ U ☐ NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	☐ Y ☐ N ☒ NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED* ***Yes***)

DETAILS: **Control measures include erosion, sediment, run-on, & run-off control; litter & debris removal/management; dust & waste materials minimization; and flow dissipation. Non-structural includes employee training.**

1. TREATMENT UNITS PROPERLY OPERATED. **Overall satisfactory, but see further explanations**	☒ S ☐ M ☐ U ☐ NA
2. TREATMENT UNITS PROPERLY MAINTAINED. **Overall satisfactory, but see further explanations**	☒ S ☐ M ☐ U ☐ NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED .	☐ S ☐ M ☐ U ☒ NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☐ S ☐ M ☐ U ☒ NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE **7 of 58 SMAs under corrective action have enhanced controls**	☐ S ☒ M ☐ U ☐ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. **But, additional staff may be needed for sample retrieval or reduce target deadlines for BMP maintenance**	☒ S ☐ M ☐ U ☐ NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED. **Samplers, batteries, sample bottles, etc.**	☒ S ☐ M ☐ U ☐ NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. **LANL BMP Manual, but see further explanations**	☒ Y ☐ N ☐ NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.	☒ Y ☐ N ☐ NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED. **Not documented in reviewed procedures**	☐ Y ☒ N ☐ NA

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? ☐ Y ☒ N ☐ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? ☐ Y ☐ N ☒ NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS? ☐ Y ☐ N ☒ NA

10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? ☐ Y ☐ N ☒ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT? ☐ Y ☐ N ☒ NA

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ☐ S ☒ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED **Yes**).*
DETAILS: **No manual available for thermometers used in on-site Sample Management Office storage refrigerator. Reviewed written procedures did not include calibration of thermometers at processing facility.**

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT. **See further explanations in Section C** **No samples (e.g., no measurable storm event) at some SMAs** ☐ Y ☒ N ☐ NA

2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES. **See further explanations in Section B** **Not documented for some SMAs** ☐ Y ☒ N ☐ NA

3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT. ☐ Y ☐ N ☒ NA

4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT. ☒ Y ☐ N ☐ NA

5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT. **See further explanations in Section C** ☐ Y ☒ N ☐ NA

6. SAMPLE COLLECTION PROCEDURES ADEQUATE **Not documented in reviewed written procedures** ☐ Y ☒ N ☐ NA

a) SAMPLES REFRIGERATED DURING COMPOSITING. ☐ Y ☐ N ☒ NA

b) PROPER PRESERVATION TECHNIQUES USED. **Proper cooling not documented in reviewed written procedures.** ☐ Y ☐ N ☐ NA

c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3. **Container lids for organics and pesticides not documented in reviewed written procedures** ☐ Y ☒ N ☐ NA

7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT? **2010 Annual Report** ☒ Y ☐ N ☐ NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☐ U ☒ NA *(FURTHER EXPLANATION ATTACHED **No**)*
DETAILS**:**

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. ☐ Y ☐ N ☒ NA
TYPE OF DEVICE _____

2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. ☐ Y ☐ N ☒ NA

3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. ☐ Y ☐ N ☒ NA

4. CALIBRATION FREQUENCY ADEQUATE. ☐ Y ☐ N ☒ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES. ☐ Y ☐ N ☒ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. ☐ Y ☐ N ☒ NA

5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. ☐ Y ☐ N ☒ NA

6. HEAD MEASURED AT PROPER LOCATION. ☐ Y ☐ N ☒ NA

7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES. ☐ Y ☐ N ☒ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED **Yes**)*
DETAILS: **Contract laboratories not inspected. Overall satisfactory based on review of data package for 2M-SMA-1.44.**

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)* ☒ Y ☐ N ☐ NA

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. **See further explanations** ☒ S ☐ M ☐ U ☐ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. **See further explanations** ☒ S ☐ M ☐ U ☐ NA

5. DUPLICATE SAMPLES ARE ANALYZED. 100 % OF THE TIME. **Lab, unless insufficient volume No field duplicates** ☒ Y ☐ N ☐ NA

6. SPIKED SAMPLES ARE ANALYZED. 100 % OF THE TIME. **Lab matrix spikes** ☒ Y ☐ N ☐ NA

7. COMMERCIAL LABORATORY USED. ☒ Y ☐ N ☐ NA

LAB NAME **1) Cape Fear Analytical, LLC (910-795-0421)** **2) GEL Laboratories, LLC (843-556-8171)**
LAB ADDRESS **3306 Kitty Hawk Road, Suite 120, Wilmington, NC 28405** **P.O. Box 30712, Charleston, SC 29417**
PARAMETERS PERFORMED **Radioactivity, Cyanide, Metals, PCBs, High Explosives (HE), SVOC, Pesticides**

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. ☐ S ☒ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED **No**).*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
Observed SMAs	**No discharge**	**No discharge**	**No discharge**	**No discharge**	**No discharge**	**No discharge**	**No discharge**

RECEIVING WATER OBSERVATIONS: **No storm water discharge was observed during this inspection. No oil sheen, grease, turbidity, visible foam, float solids from the inactive SWMUs, or color was observed in the standing water in a channel leading to the sampler for W-SMA-5. No flow in receiving waters was observed. Exceedance of Benchmark TAL indicate corrective action and enhancement to control measures (as conditioned in the permit) are needed.**

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☐ U ☒ NA *(FURTHER EXPLANATION ATTACHED **No**).*
DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ☐ S ☐ M ☐ U ☐ NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. ☐ S ☐ M ☐ U ☐ NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: _____ (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES *(FURTHER EXPLANATION ATTACHED **No**).*

1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ☒ N ☐ NA

2. TYPE OF SAMPLE OBTAINED
GRAB _____ COMPOSITE SAMPLE ____ METHOD ____ FREQUENCY

3. SAMPLES PRESERVED. ☐ Y ☐ N ☒ NA

4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☒ NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☒ NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ☒ NA

7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☒ NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☒ NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☒ NA

Los Alamos National Laboratory
Individual Stormwater NPDES Permit No. NM0030759
Compliance Evaluation Inspection
January 31, 2012 - February 3, 2012

Introduction

A Compliance Evaluation Inspection (CEI) was conducted at the Los Alamos National Laboratory (LANL) in Los Alamos County, New Mexico starting January 31, 2012 thru February 3, 3012 by Erin S. Trujillo, accompanied by Sarah Holcomb, both of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB), Point Source Regulation Section (PSRS). For storm water discharges, the facility is classified as a minor federal facility under the federal Clean Water Act (CWA), Section 402 National Pollutant Discharge Elimination System (NPDES) permit program. U.S. Department of Energy (DOE), National Nuclear Security Administration (NNSA), Los Alamos Site Office (LASO) and Los Alamos National Security, LLC (LANS) are jointly authorized to discharge storm water associated with industrial activities from specified solid waste management units (SWMUs) and areas of concern (AOCs) or sites identified in Appendix A of NPDES permit number NM0030759.

Stormwater discharges are to tributaries or main channels of Mortandad Canyon, Cañada del Buey, Los Alamos Canyon, DP Canyon, Sandia Canyon, Ten Site Canyon, Canyon de Valle, Water Canyon, Ancho Canyon, Bayo Canyon, Chaquehui Canyon, Fence Canyon, Pajarito Canyon, Two-Mile Canyon, Three-Mile Canyon, Potrillo Canyon, Pueblo Canyon and Rendija Canyon in Segments 20.6.4.97, 20.6.4.126 or 20.6.5.128 *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC*) of the Rio Grande Basin.

Upon arrival at Technical Area (TA) 59 at approximately 0900 hours on January 31, 2012, the inspector made introductions, presented credentials and briefly discussed the purpose of the inspection with Terrill Lemke, Storm Water Permitting/Compliance Team Leader, LANL Water Quality & RCRA Group (ENV-RCRA), LANS. An entrance interview meeting to further discuss the purpose of the inspection was then conducted with representatives of LANS and USDOE on January 31, 2012. The inspectors; Mr. Lemke; Sam Loftin and Jeff Walterscheid, also of ENV-RCRA, toured selected site monitoring areas (SMA) on January 31, 2012 thru February 3, 2012. Gene E. Turner, Environmental Permitting Manager, Environmental Projects Office, LASO, DOE; Richard E. Powell, NMED SWQB; and Courtney Perkins and Ralph Ford Schmid, NMED DOE Oversight Bureau were present during some field tours. An exit interview meeting with LANS and USDOE staff was conducted on February 3, 2012 at approximately 1130 hours. The inspectors left the facility at approximately 1300 hours on February 3, 2012. Below is a list of the SMAs, site(s) and associated watersheds toured during this inspection:

S-SMA-6	72-001	Sandia Canyon
2M-SMA-1.44	06-001(b)	Two-Mile Canyon
CDB-SMA-0.55 & 0.25	46-004(g) & 46-004(m)	Cañada del Buey Canyon
M-SMA-9.1	35-016(f)	Mortandad Canyon
Pratt-SMA-1.05	35-003(r)	Ten Site Canyon
B-SMA-1	00-011(d)	Bayo Canyon
LA-SMA-6.3 & 6.31	21-006(b) & 21-027(a)	Los Alamos Canyon
PJ-SMA-5 & 5.1	22-015(c) & 22-016	Pajarito Canyon
W-SMA-5	16-003(f), 16-001(e), etc.	Water Canyon
3M-SMA-0.6	15-008(b)	Three-Mile Canyon
PT-SMA-1	15-008(a) & 15-004(f)	Potrillo Canyon
CHQ-SMA-5.05, 6 & 7.1	33-007(b) & 33-010(g)	Chaquehui Canyon

The NMED performs a certain number of CEIs each year for the U.S. Environmental Protection Agency (USEPA), Region VI. The purpose of this inspection is to provide the USEPA with information to evaluate the Permittee's compliance with the NPDES permit. This inspection report is based on information provided by the Permittee's representatives, observations made by the NMED inspectors, and records and reports kept by the Permittee and/or NMED, including LANL on-line public involvement documents available at http://www.lanl.gov/environment/h2o/ip.shtml?1.

Summary of Individual Stormwater Permit Conditions

Under USEPA's Individual Stormwater Permit for LANL, "*Permittees are required to implement site-specific control measures (including best management practices) to address the non-numeric technology-based effluent limits contained in the Permit, followed by confirmation monitoring against New Mexico water-quality criteria-equivalent target action levels to determine the effectiveness of the site-specific measures.*"

Control measures include erosion and sedimentation controls; management of run-on and runoff; employee training; unauthorized discharges and other controls. The permit lists the installed or planned baseline control measures for each of the 250 permitted features or SMAs. The permit includes conditions for confirmation monitoring requirements and sampling locations (latitude and longitude). Monitoring at all SMAs (405 sites) includes radioactivity, cyanide, and metals. Some SMAs and sites have additional monitoring requirements for polychlorinated biphenyls (PCBs), high explosives (HE), semi-volatile compounds, and/or pesticides. The permit lists the applicable target action levels (TALs) for pollutants--maximum and average (MTAL and ATAL). The applicable TALs are not themselves effluent limitations, but are benchmarks to determine the effectiveness of control measures implemented to meet the non-numeric technology-based effluent limitations.

If any validated sample analytical result for a specific pollutant of concern at a particular SMA is greater than the applicable TAL (or applicable Minimum Quantification Level (MQL), whichever is greater), then corrective action (visual inspection, re-evaluate existing control measures, and initiation of corrective action as soon as practicable) is required. Confirmation samples are required following installation of corrective action enhanced control. The permit includes conditions for completion of corrective action, alternative compliance, and deadlines for the 63 high priority sites assigned in 33 SMAs and moderate priority sites. Permittees must certify completion of corrective action for all high priority sites within three (3) years and for all moderate priority sites within five (5) years of the effective date of the permit, or such other time period pursuant to the permit.

The permit requires a Site Discharge Pollution Prevention Plan (SDPPP) and includes conditions for document contents, SDPPP team, receiving waters and wetlands, summary of potential pollutant sources, description of control measures, schedules for control measures installation, monitoring and inspection procedures, signature requirements and other documentation. Conditions for inspection requirements (erosion inspection and reevaluation, post-storm inspection and reports) are also provided in the permit. Reporting requirements include compliance status reports, including discharge monitoring reports, with reporting periods from January 1st to December 31st and annual reports. Other conditions include, but are not limited to, construction activity associated with site remediation; deletion of site; watershed protection approach; and public involvement (website, e-mail notification, and public meetings). The permit also provides requirements for 24-hour oral reporting, composite, data average and permit reopener conditions. Standard conditions for NPDES permits are also included in the permit.

Baseline Controls; Site Boundary and SMA Sampler Location; and Corrective Action Status

Baseline controls were certified to be complete for each SMA. The SDPPP was prepared in five volumes based on watershed. Additional or "augmented" controls were installed for some sites or SMAs. On-site representatives use the term "augmented" to indicate controls that were installed following installation of baseline controls, but not as a requirement of TAL exceedances and corrective action. The facility has approximately 175 Teledyne ISCO samplers and also uses single stage samplers for monitoring. Changes to some SMA sample locations have been made. On-site representatives stated that changes to SMA sample locations were minor. Of the 250 SMAs, only 74 SMAs have been sampled (176 SMAs not sampled). TAL exceedances were reported between September 28 and November 22, 2011 and occurred at 58 of the 74 sampled SMAs. Pollutants exceeding TALs included weak acid dissociable Cyanide; Aluminum; Copper; Lead; Mercury; Zinc; Total PCB; Gross alpha; and Radium 226 and Radium 228. In the 2011 field season, there were no direct fire impacts from the Las Conchas Fire; however, there were four (4) fire-related significant event inspections and affects to control measures from post-fire flooding in Cañon de Valle. Only seven of the 58 SMAs that require corrective action have enhanced controls initiated. On-site permittee representatives stated that further construction for enhanced controls had been delayed during winter.

Findings

Section A - Permit Verification – Overall Rating of "M = Marginal"

Permit Requirements for Permit Verification

Part I.D.2 (Sampling Locations) of the permit states:

> *SMA locations are based on reasonable site accessibility for sampling purposes and the Permittees' best judgment to ensure that samples taken at a particular point will be representative of discharges from Sites in the drainage area.*

Part III.C.2 (Standard Conditions, Representative Sampling) of the permit states:

> *Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.*

Part III.D.9 (Reporting Requirements, Other Information) of the permit states:

> *Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information.*

Findings for Permit Verification

Appendix A and B of the permit may not provide representative sampling locations or monitoring for pollutants of concern (POC). For some sites, there was insufficient information in the SDPPP or site map to verify that the SMA sampler location in Appendix A of the permit would be representative of the monitored activity (stormwater discharges and effectiveness of the site-specific measures). For some sites, the SDPPP indicates POC (HE, PCBs, and possibly SVCs) that are not required in Appendix B of the permit to be monitored at the associated SMA. The Permittees may have additional information or data on the actual pollutants of concern for these sites, but a summary of this information is not documented in the SDPPP. Specific examples of SMAs where representative sampling locations or POCs

need to be confirmed are discussed below. The Permittee would need to contact the USEPA permit writer to determine if a permit modification is required.

Section B - Recordkeeping and Reporting Evaluation – Overall Rating of "M = Marginal"
Permit Requirements for Recordkeeping and Reporting

Part B.1 (Control Measures, Installation of Baseline Control Measures) states:

> *Permittees must select, design, install and implement baseline control measures (including best management practices) to minimize storm water pollutant discharges as necessary to meet the non-numeric effluent limits established in Part I.A. of the Permit. The selection, design, installation, and implementation of these measure must be in accordance with good engineering practices and manufacturer's specifications.*

Part I.B.2 of the permit states:

> *The Permittees must keep documentation onsite that describes procedures and a regular schedule for preventative maintenance of all control measures and discussions of back-up practices in place should a runoff event occur while a control measure is off-line.*

Part I.I.7(a) of the permit states:

> *Within six (6) months after the effective date of the Permit, the Permittees shall establish a public web site where information on the Permit, including the SDPPP…and other relevant data and documents, will be made available.*

Part III.C.4 (Standard Conditions, Record Contents) of the permit states:

> *Records of monitoring information shall include:*
> *a. The date, exact place, and time of sampling or measurements;*
> *b. The individual(s) who performed the sampling or measurements;*
> *c. The date(s) and time(s) analyses were performed;*
> *d. The individual(s) who performed the analyses;*
> *e. The analytical techniques or methods used; and*
> *f. The results of such analyses.*

Part III.D.11 (Standard Conditions, Signatory Requirements) of the permit states:

> *All applications, reports, or information submitted to the Director shall be signed and certified.*
>
> *a. ALL PERMIT APPLICATIONS shall be signed as follows: (1) FOR A CORPORATION - by a responsible corporate officer....*
>
> *b. ALL REPORTS required by the permit and other information requested by the Director shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if: (1) The authorization is made in writing by a person described above; (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, or position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. A duly authorized representative may thus be either a named individual or an*

individual occupying a named position; and, (3) The written authorization is submitted to the Director.

Findings for Recordkeeping and Reporting

SDPPP

1) Pollutants of Concern: As previously discussed, activities for some sites discussed in SDPPP Section 1000 (Potential Pollutant Sources) describe pollutants that were not listed in tables summarizing the pollutants of concern (POC) for historical industrial areas within the permitted feature. For example HE is discussed in SDPPP Volume 1 for B001 B-SMA-0.5 in Section 1000.1.2 for sites 10-001(a), 10-001(b), & 10-001(c), 10-001(d), but HE is not listed in the Section 1000.1.2.1 table. Additional examples that may not be adequately listed for specific SMAs are attached. Part I.F.1(d) of the permit states, *"The SDPPP must identify each Site at the facility where industrial materials or activities were previously exposed to storm water and from which allowable non-storm water discharges were released. The SDPPP must also identify the pollutants of concern associated with those activities."*

2) Representative Samples: Many factors were considered in determining sampler locations that are not documented in the SDPPP. Other site access factors or updated information on the affected area may have been considered, but this information is not documented in the SDPPP.

   For some sites (e.g., storm drain outlets, outfall, and sumps with sampling locations close to site boundaries), it was not documented that SMA sampling locations would obtain samples that would be representative of the affected area or area subject to corrective action associated with the industrial activity. Specific examples of sample locations that may not be adequate for representative samples are attached. For example, the reason for placing the sampler below and near the 35-016(f) storm drain outlet instead of closer to the known or possible affected area, in this case closer to Mortandad Canyon, is not documented for M-SMA-9.1 (see Figures 1 and 2).

   Some sites are not shown located in the drainage areas shown on site maps for sampler locations. In some cases, the site or drainage area was plotted incorrectly on site maps according to on-site representatives. In other cases, effluent (stormwater runoff) from one site or area of a site was considered substantially identical to another site or area of a site. Site boundary or drainage area errors on site maps need to be corrected or otherwise indicated.

   For a sampler located in a receiving water (e.g., S-SMA-6, Site 72-001 Active Firing Range) it is unknown if the monitoring results are representative. Where the drainage area is substantially larger than the site, the sampler location may be obtaining a highly diluted sample (concentrations lower than actual pollutants in discharge from site) or may be obtaining pollutants from upgradient or watershed sources which may have higher pollutant concentrations than the actual stormwater runoff from a site.

   The Permittee would need to contact the USEPA permit writer to determine if a permit modification is required if it is determined that the sampler location is not representative per Part I.D.2 (Sampling Locations) of the permit.

3) Control Measures/Site Maps:

   a. Baseline Established Vegetation/Needle Cast: Documentation was not provided that describes procedures and a regular schedule for preventative maintenance for baseline established vegetation control measures. SDPPP Section 600 stated, *"Control measures referenced in this document follow the specifications provided in Storm Water BMP Manual."* However, procedures for established vegetation were not provided in the reviewed manual. Needle cast is not correctly listed in the SDPPP as an established vegetation control. Rather needle cast may provide temporary stabilization perhaps similar to unseeded mulch. Additional information on inspection procedures appears needed. For example, needle cast may affect the performance of other control measures as indicated in the on-line inspection report summary for PJ-SMA-7 on 06/21/11 (LA-UR-11-11472) that stated, *"Pine needles observed in culvert J00804040003. BMP-13972 Cleaned pine needles out of culvert J00804040003 upon arrival."* Baseline established vegetation control measures are also not shown or otherwise indicated on SDPPP site maps. Reviewed Visual Inspection Forms list permanent vegetation as a control measures inspected (operating effectively or in need of maintenance). But, there was no documentation on the boundaries of the inspection or evaluation criteria for this control measure.

   b. Juniper Bales: Documentation was not provided that describes procedures and a regular schedule for preventative maintenance for juniper bale check dams listed in baseline control measure certifications and SDPPP. On-site permittee representatives stated that juniper bale check dams are no longer being installed at LANL. Procedures for juniper bales were not provided in the reviewed LANL Storm Water BMP Manual.

   c. Site Map Flow/Drainage Area: For some sites or SMAs, it was not clear on site maps by arrow or otherwise how stormwater effluent (runoff) was being directed to a sampler. Flow arrows that are not perpendicular to topography lines shown on the map need to be confirmed and possibly corrected. Specific examples where flow direction needs to be confirmed and corrected, as appropriate, is attached.

   d. Other SDPPP or Site Map Corrections: Other needs for clarifications, additions or corrections to the SDPPP or site maps were observed. Specific examples where information needs to be confirmed, clarified or corrected, as appropriate, is attached. On-site permittee representatives had updated site maps with corrections, augmented controls and revised site boundaries which may address some of these issues.

4) Non-Storm Water Discharges: General statements on the NPDES Industrial Stormwater Multi-Sector General Permit (MSGP) in SDPPP Section 600.3 and list of allowable non-stormwater discharges could be misunderstood. This language needs to be removed. Part 1.A.4 (Unathorized Discharges) of the permit states, *"The Permittees must eliminate non-stormwater discharges…not authorized by an NPDES permit."*

5) Public Involvement: An incomplete SDPPP was made available on the LANL public involvement website. SDPPP 300.4.3 stated, *"Current versions of all IP related SOPs are summarized in Attachment E. The summary table in Attachment E also provides a hyperlink to the current version of*

the applicable procedure that resides on the public website." There were no on-line hyperlinks in Appendix E of the SDPPP at the beginning of this four day inspection. On-site permittee representatives made arrangements for on-line hyperlinks to procedural documents by the end of this inspection. Also, training documentation was available on-site, but there was no training information in SDPPP Attachment F of either the on-site or on-line SDPPP.

Analytical Records

The reviewed contract laboratory analysis data package for 2M-SMA-1.44 did not include dates and times of analyses for metal monitoring.

2010 Annual Report

Sixteen sites were reported to have completed Consent Order corrective action in the 2010 Annual Report (see LA-UR-11-10019, Annual Report, March 1, 2011, Section 2.5, Pgs 12-14 including Table 12). However, it was not clearly written if there were 10 or 12 sites that require controls to address potential transport. Updates, clarification or corrections to the reported list of 10 is needed in the next Annual Report.

24-Hour Notices

Incorrect information may have been submitted to USEPA in 24-hour reports of TAL exceedances based on a review of the following LANL e-mails in NMED SWQB files:

- LANL e-mail sent 1/01/2011 appears to have information switched for Permitted Features V003 and J003.
- LANL e-mail sent 10/20/2011 lists Permitted Feature J028 twice. One set of data reported for J028 may be for J031.

If incorrect information was submitted, then the Permittee needs to promptly submit such facts or information per Part III.D.9 of the permit.

Authorization Signatures

DOE written authorization for a duly authorized representative to sign reports, in this case inspection reports signed by LANS staff, was not contained in record keeping reviewed during this inspection. It was also noted that LANS written authorization for a duly authorized representative to sign reports needs to be updated (signed by current responsible corporate officer). The reviewed written authorization dated March 2, 2009 was signed by the former LANS Associate Director, Environment, Safety, Health (J. Chris Cantwell).

Section C - Operations and Maintenance – Overall Rating of "S = Satisfactory"

Permit Requirements for Operations and Maintenance

Part I.B.2 (Maintenance of Control Measures) of the permit states,

The Permittees must maintain all control measures in effective operating condition. Failure to do so is a violation of this Permit. The Permittees must keep documentation onsite that describes procedures and a regular schedule for preventative maintenance of all control measures and discussions of back-up practices in place should a runoff event occur while a control measure is off-

line. Nonstructural control measures must also be diligently maintained (e.g., employee training). Nothing in this Permit shall be construed to prevent the Permittees from taking action(s) to modify control measures as appropriate to address deficiencies. If during inspections, or any other event or observation, control measures that are not operating effectively are identified, the Permittees must repair or replace them before the next anticipated storm event if possible, or as soon as practicable following that storm event. In the interim, the Permittees must have back-up measures in place.

Part I.D.1 (Initial Sampling) of the permit states:

Initial monitoring requirements and frequency of sampling for each pollutant of concern following installation and implementation of baseline control measures vary on a site-by-site basis as specified below: (a) For Sites at which baseline control measures to address the non-numeric effluent limits in Part I.A. of the Permit have already been installed and implemented prior to the effective date of this permit, the Permittees shall collect two or more confirmation samples. One (1) confirmation sample shall be collected during each of at least two (2) separate measurable storm events occurring at least fifteen (15) days apart and within one (1) year after the effective date of this Permit at associated SMAs. (b) For Sites at which baseline control measures to address the non-numeric effluent limits in Part I.A. of the Permit are installed within six (6) months of the effective date of the permit, the Permittes shall collect two or more confirmation samples. One (1) confirmation sample shall be collected during each of at least two (2) separate measurable storm events occurring at least fifteen (15) days apart) and within eighteen (18) months after the effective date of this Permit at associated SMAs.

Findings for Operation and Maintenance

Back-up Practices

On-site representatives stated that inspection crews have the ability to maintain some control measures during an inspection. However, procedures for emergency treatment control, in this case back-up practices should a runoff event occur while a control measure is off-line, was not documented in reviewed written procedures.

For example, LANL ENV-RCRA-QP-082.0 Performing NPDES Stormwater Individual Permit Compliance Inspections Page 11 of 14 stated, *"Notify…by e-mail when informed by an inspector that a Site for which monitoring has ceased exhibits evidence of a discharge of contaminated runoff, or conditions that could lead to a discharge of contaminated runoff; or if a "No Exposure" Site may no longer meet the criteria for non exposure status….Notify…of the 30-day deadline (from the date of compliance inspection) to initiate appropriate action to correct problems)."*

A 30-day deadline described in written procedures may not be sufficient to meet back-up permit requirements. Additional staff may be needed to repair or replace control measures sooner than 30-day target deadlines especially during the summer thunderstorm season.

Control Measures Operation/Maintenance

Overall, operation and maintenance of structural and non-structural control measures was satisfactory. Examples of the need for review, maintenance, augmented or enhanced controls at sites or SMAs observed during the field tour of this inspection are attached. Observations for S-SMA-6 are discussed below:

S-SMA-6, Site 72-001 (Active Firing Range)

Employee training (non-structural control measure) was not documented for employees who work in areas where industrial materials or activities are exposed to storm water. Employees at this active area also implement litter and debris removal and management control measures identified in the SDPPP according to on-site permittee representatives. Employees at this location also maintain berms that are shown on updated site maps. If these or other employees are responsible for implementing control measure activities identified in the SDPPP, then training is required at least once per year *(*see Part 1.A.3 Employee Training of the Permit*).*

Litter and debris associated with the active industrial activities was observed in the stream bed of Sandia Canyon. Additional site-specific litter and debris controls appear needed. SDPPP Volume 2, Pg 478 for S-SMA-6 states, *"This SMA will be regularly inspected for litter and visible debris."* Part I.A.5 (Other Controls) of the permit states, *"The Permittees must do the following where applicable: (a) Implement controls to ensure that no waste, garbage, or floatable debris are discharged to receiving waters, except as authorized by a permit issued under section 404 of the CWA…(c) Minimize the introduction of raw, final, or waste materials to exposed areas."*

The selection, design, installation, and implementation of control measures, in this case sand berms, was not documented. Sand berms used for flood control were shown on updated site maps by the operators. The sand berms were not stabilized (vegetated or otherwise protected from erosion). The start of erosion features were observed in the berm. Sand berm installation and maintenance procedures were not specifically described in LANL Storm Water BMP Manual.

Initial Monitoring Frequency

Of the 250 SMAs, only 74 SMAs have been sampled. Only 20 of the 63 SMAs with high priority sites were sampled—43 SMAs were not sampled by the first year deadline. Unless there are measurable rain events, it may be difficult for the Permittees to meet the 18 month deadline for moderate priority sites. Reasons for not monitoring at some SMAs could include equipment failure according to on-site permittee representatives. Some inspection records also indicated that wildlife interfered with the operation of the sampler.

Problems with sample collection and maintenance activities was recorded for W-SMA-5. A rain gage triggered sampler inspections at least 9 times in 2011. The 08/18/2011 rain event at RG257 triggered a work order for a sampler inspection by a target date of 08/28/2011 with an actual inspection on 08/23/2011. The 08/23/2011 inspection record indicated that the sampler was not on and functioning properly upon arrival. The 08/23/2011 record also indicated that maintenance to clean out strainer was conducted. No sample volume was retrieved. The 10/04/2011 Sampler Maintenance record indicated that the sampler was not on upon departure, but the 10/06/2011 Inspection Record indicated that the sampler was on and functioning properly upon arrival. Additional staff may be needed for sample retrieval before target deadlines and/or to review possible discrepancies in inspection reports to correct possible problems.

Extensions of compliance deadlines (See Part I.E.1.d of the permit) apply if no confirmation sample could be collected due to lack of a measurable storm event. Non-compliance with meeting the monitoring frequency and deadline requirements will need to be reported (see Part III.D.8 of the permt).

Section D - Self-Monitoring – Overall Rating of "M = Marginal"

Permit Requirements for Self-Monitoring

Part III.C.5.a (Standard Conditions, Monitoring Procedures) of the permit states:

> *Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator.*

Findings for Self-Monitoring

The following container materials and preservation techniques at the time of sample collection and when processed at the Sample Management Office was not documented in the reviewed procedures:

- Footnote 7 of 40 CFR 136.3 Table II states, *"For dissolved metals, filter grab samples within 15 minutes of collection and before adding preservatives."* Dissolved metals, except for Mercury and Selenium, are required to be monitored, in the permit. Timing for filtration was not described in reviewed procedures.

- Container requirements in 40 CFR 136.3 Table II for organics analyzed by GC, LC, or GC/MS and pesticide monitoring require fluoropolymer-lined caps, for example PTFE or Teflon. Container lid requirements were not described in reviewed procedures.

- Footnote 2 of 40 CFR 136.3 Table II states, *"…preserve each grab sample within 15 minutes of collection."* Cooling preservation requirements in Table II for organic and pesticide monitoring was not described at the time of collection in reviewed procedures.

- Requirements for weak acid dissociable Cyanide and PCB Method 1668B are not in 40 CFR 136.3, but the methods include cooling and storage requirements. Standard Method (SM) 4500-CN-I and SM 4500-CN-B (Preliminary Treatment of Samples) states, *"Because most cyanides are very reactive and unstable, analyze samples as soon as possible. If sample cannot be analyzed immediately, add NaOH pellets or a strong NaOH solution to raise sample pH to 12 to 12.5, add dechlorinating agent if sample is disinfected, and store in a closed, dark bottle in a cool place."* Sample collection, preservation, storage, and holding times in PCB Method 1668B dated November 2008 states, *"Maintain aqueous samples in the dark at <6 °C from the time of collection until receipt at the laboratory."* These specific Cyanide and PCB storage requirements at the time of collection and at the processing facility were not described in the reviewed procedures.

LANL may have additional information in EP-ERSS-SOP-5056 Sample Containers and Preservation referenced in SOP-5215 Processing Storm Water Samples, but the containers and preservation document was not provided during the inspection or obtained as of the writing of this report.

Digital read thermometers used in sample storage refrigerators had not been calibrated since 02/07/2008 which is before the effective date of the permit according to on-site permittee representatives. LANL's practices included checks and logs of the refrigerator temperature. However, there was no documentation to ensure that the thermometers readings were accurate. Temperature documentation is important since one of the refrigerators needed repair the week of 08/09/2010. On-site representatives did not have a readily-available manual for the thermometers to confirm that the instrument used were traceable National Institute of Standards and Technology (NIST) or NIST calibrated thermometers, or if the manufacturer recommended calibration. As an example of procedures, USEPA National Pollutant Discharge Elimination System Compliance Inspection Manual, Table 5-4 quality control procedures for

field analyses and equipment states, *"All standardization should be against a traceable NIST or NIST calibrated thermometer…Biweekly, check at two temperatures against a NIST or equivalent thermometer…Temperature readings should agree within ±1°C or the thermometer should be replaced or recalibrated."*

Section F – Laboratory – Overall Rating of "S = Satisfactory"

Permit Requirements for Laboratory

Part III.C.5.b (Standard Conditions, Monitoring Procedures) of the permit states:

> *The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.*

Findings for Laboratory

Overall, an adequate and extensive analytical quality control program appears to be maintained based on the reviewed analytical data package. However, it was not clearly documented if or how the contract laboratory took necessary corrective actions when data falls outside warning or control limits. For example, contract laboratory weak acid dissociable Cyanide certificate of analysis report for sample ID WT_IPPAJ-11-11141 dated September 26, 2011 indicated that an analytical holding time and preparation or preservation holding time was exceeded. ICPMS#5 Summary Report for Quality Control (QC) Std 3 and Std 6 dated September 20, 2011 indicated QC out of limits for Aluminum standards. ICPMS#9 Summary Report QC Std 10 dated September 8, 2011 also indicated QC out of limits for some metal standards. In these cases, the quality assurance (QA) action line indicated "continue." It was not determined as part of this inspection if these flags were re-occurring issues. The Permittees would need to review other data packages and/or follow up with the contract laboratory to determine if procedures were adequate to correct these limits.

Figure 1: NMED Hazardous Waste Bureau map dated March 2002 showing TA-35 affected area, including site 35-016(f) called out for this figure, extending to Mortandad Canyon.

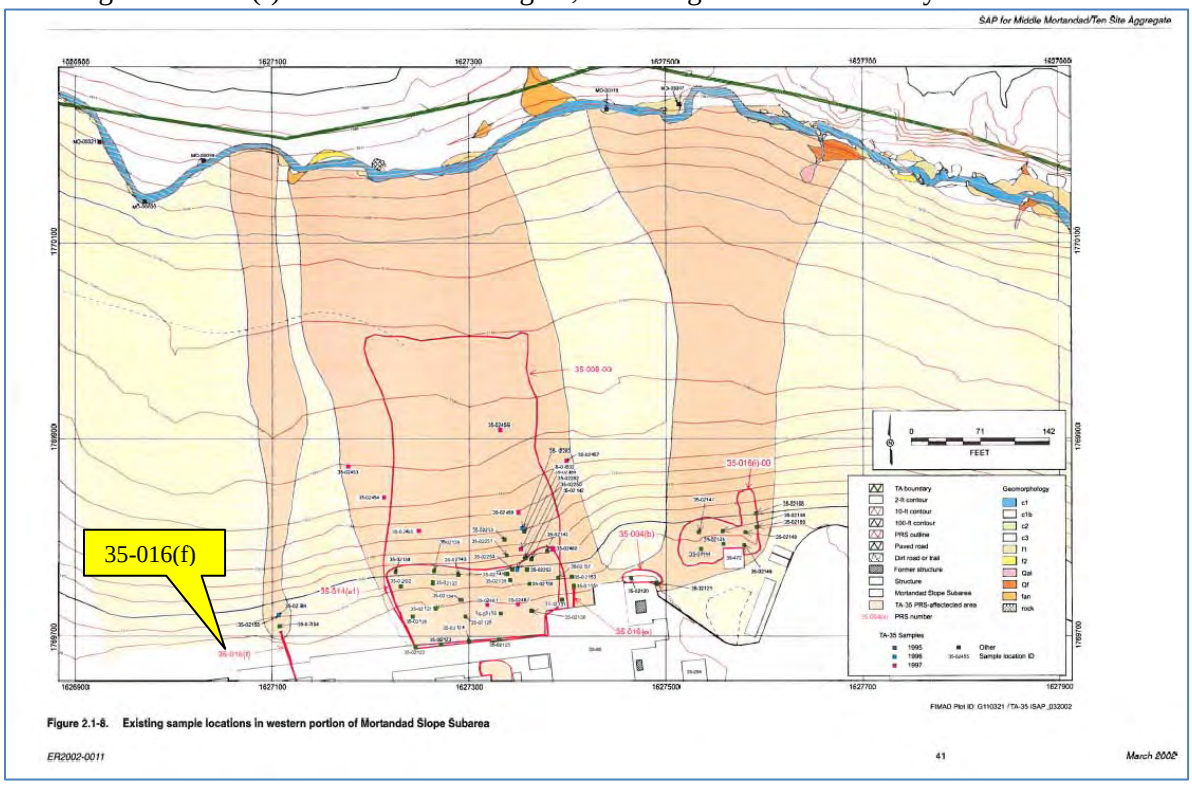
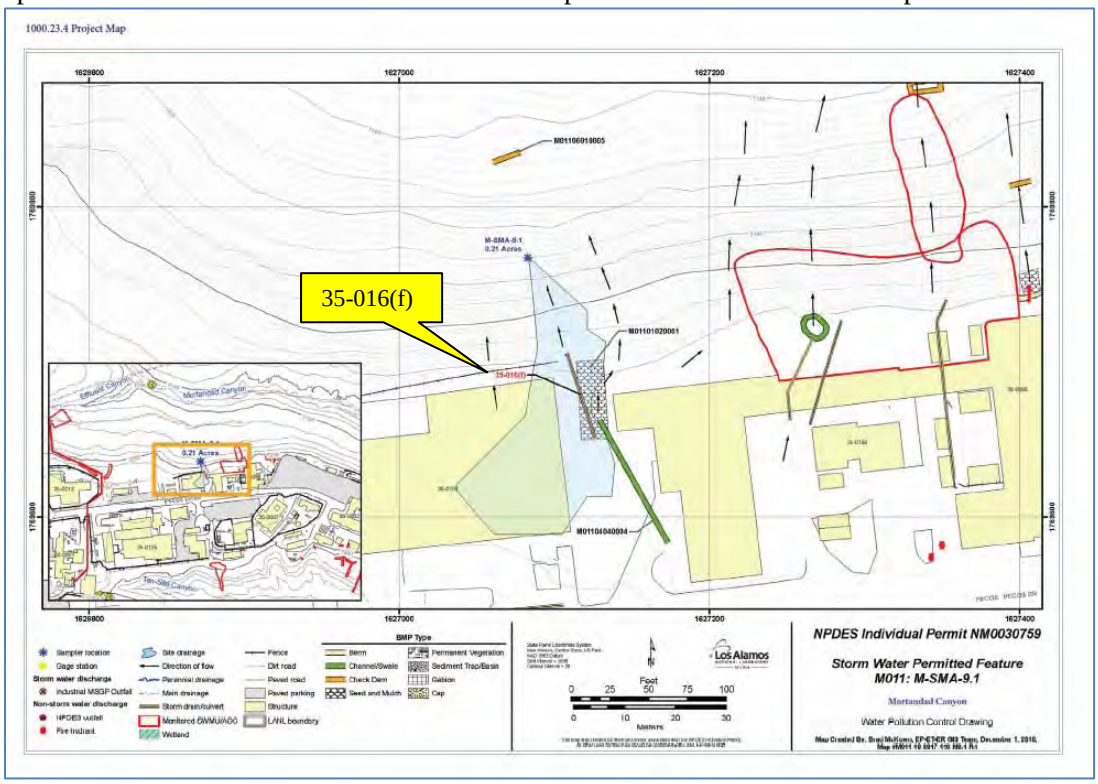


Figure 2: LANL SDPPP M-SMA-9.1 Site Map dated December 1, 2010 with site 35-016(f) called out for this figure. SDPPP (in site map or otherwise) does not provide information on known, possible or updated affected area after 2002 to confirm sampler location would obtain representative sample.



Los Alamos National Laboratory Individual Stormwater NPDES Permit No. NM0030759
Compliance Evaluation Inspection, January 31, 2012 - February 3, 2012
Attachment - Comments on Specific Sites or Site Monitoring Areas (SMA)

Permitted Feature SMA	Site	Sampler Location - Clarification or additional info that location is representative appears needed in SDPPP:	Pollutants of Concern - Clarification or addition of POCs appears needed in SDPPP:	Control measure maintenance / Other clarification or correction appears needed in SDPPP and/or Site Map:
Los Alamos Canyon / Pueblo Canyon Watersheds				
R005 R-SMA-2.3	00-011(e)	It is not clear that location of sampler is sufficiently down gradient to be representative of pollutant sources (affected area) of Site.		Confirm flow direction arrows.
B001 B-SMA-0.5	10-001(a)		HE discussed in 1000.1.2 (10-001(a), 10-001(b), & 10-001(c), 10-001(d)), but not in 1000.1.2.1 (POCs) and 1000.1.5 (Plan).	It is not clear if there is a Site at the northwest edge of drainage area of sampler (map insert) that needs to be labeled.
B001 B-SMA-0.5	10-001(b)		see above	see above
B001 B-SMA-0.5	10-001(c)		see above	see above
B001 B-SMA-0.5	10-001(d)			see above
B001 B-SMA-0.5	10-004(a)			see above
B001 B-SMA-0.5	10-004(b)			see above
B001 B-SMA-0.5	10-008			see above
B001 B-SMA-0.5	10-009			see above
P002 ACID-SMA-2	01-002(b)-00	Drainage Area is substantially larger than Sites. Site includes Receiving Water. Sampler appears within Receiving Water (Acid Canyon) on Site Map.		
P002 ACID-SMA-2	45-001	see above		
P002 ACID-SMA-2	45-002	see above		
P002 ACID-SMA-2	45-004	see above		
P003 ACID-SMA-2.1	01-002(b)-00	Drainage Area is substantially larger than Site.		
P004 P-SMA-0.3	00-018(b)	Majority of Site is not within Drainage Area of sampler. Reason for location of sampler is not clear on Site Map.	SDPPP 1000.53.2 says "Suspect contaminants at AOC 00-018(b) were inorganic chemicals, organic chemicals, PCB/pesticides, and radionuclides." Confirm if PCB and Pesticides are POCs. If POCs, list in Table 1000.53.2.1.	It is not clear if structures shown on map insert are to be shown on Site Map.
P005 P-SMA-1	73-004(d)	Site is not within Drainage Area of sampler.		
P008 P-SMA-2.2	00-019			Confirm flow direction arrows.
L005 LA-SMA-1.25	C-43-001	Sampler location is at or near outlet of storm drain/culvert. It is not clear that location of sampler is sufficiently down gradient to be representative of pollutant sources (affected area) of Site.		
L007 LA-SMA-2.3	01-001(b)			Confirm flow direction arrows.
L008 LA-SMA-3.1	01-001(e)	Site is not within Drainage Area of sampler.		
L009 LA-SMA-3.9	01-001(g)			It is not clear how the County/DOE boundary affects boundary of Drainage Area. Confirm flow direction arrows below the sampler.
L012 LA-SMA-5.01	01-001(d)			Confirm flow direction arrows.
L012A LA-SMA-5.02	01-003(e)	It is not clear that location of sampler is sufficiently down gradient to be representative of pollutant sources (affected area) of Site.		One flow direction arrow is shown crossing L012A03010002 berm. Reason for this one location is not clear. SDPPP says site is co-located, but it appears discrete.
L013 LA-SMA-5.2	01-003(d)			Confirm flow direction arrows above Drainage Area.

Permitted Feature SMA	Site	Sampler Location - Clarification or additional info that location is representative appears needed in SDPPP:	Pollutants of Concern - Clarification or addition of POCs appears needed in SDPPP:	Control measure maintenance / Other clarification or correction appears needed in SDPPP and/or Site Map:
L016 LA-SMA-5.33	32-004			It is not clear how the County/DOE boundary limits boundary of Drainage Area.
L017 LA-SMA-5.361	32-002(b)			It is not clear how flow of Site that intersects 32-003 is directed to this sampler.
L018 LA-SMA-5.51	02-003(a)			Confirm flow direction arrows.
L018A LA-SMA-5.52	02-003(b)			Control Measures shown on L018 Site Map near this drainage may need to be shown on this Site Map.
L018B LA-SMA-5.53	02-009(a)	Sampler location is at or near Site. It is not clear that location of sampler is sufficiently down gradient to be representative of pollutant sources (affected area) of Site.		
L019 LA-SMA-5.91	21-021			Site or Limits for 21-021 are not on Site Map or map insert.
L019A LA-SMA-5.92	21-021			Site or Limits for 21-021 are not on Site Map or map insert.
L020 LA-SMA-6.25	21-021			Site or Limits for 21-021 are not on Site Map or map insert.
L020 LA-SMA-6.25	21-024(d)			It is not clear why drainage area boundary ends at berm.
L021 LA-SMA-6.27	21-021			Site or Limits for 21-021 are not on Site Map or map insert.
L021 LA-SMA-6.27	21-027(c)			It is not clear why drainage area boundary ends at berm.
L022 LA-SMA-6.3	21-006(b)			It is not clear why drainage area boundary ends at berm.
L022A LA-SMA-6.31	21-027(a)			Culvert shown on L022 at this Site is not shown on this Site Map. It is not clear why drainage area boundary ends at berm.
L024 LA-SMA-6.34	21-021			Site or Limits for 21-021 are not on Site Map or map insert.
L025 LA-SMA-6.36	21-021			Site or Limits for 21-021 are not on Site Map or map insert.
L026 LA-SMA-6.38	21-021			Site or Limits for 21-021 are not on Site Map or map insert.
L026 LA-SMA-6.38	21-024(c)		PCB discussed in 1000.43.2, but not in 1000.43.2.1 (POC) and 1000.43.5 (Plan).	
L027 LA-SMA-6.395	21-021			Site or Limits for 21-021 are not on Site Map or map insert.
L028 LA-SMA-6.5	21-021			Site or Limits for 21-021 are not on Site Map or map insert.
L029 LA-SMA-9	26-001		HE discussed in 1000.46.2, but not in 1000.46.2.1 (POC) and 1000.46.5 (Plan).	

Permitted Feature SMA	Site	Sampler Location - Clarification or additional info that location is representative appears needed in SDPPP:	Pollutants of Concern - Clarification or addition of POCs appears needed in SDPPP:	Control measure maintenance / Other clarification or correction appears needed in SDPPP and/or Site Map:
L030 LA-SMA-10.11	53-002(a)	Neither area of Site is within Drainage Area shown for sampler. Sampler is over 200 to 300 feet from areas of Site. It is not clear how flow from Sites is directed toward Drainage Area and sampler.		
D001 DP-SMA-0.3	21-029	Most of Site is not within Drainage Area of sampler. Sampler is located within Site. Receiving stream (DP Canyon) is also within site. Reason for location of sampler is not clear.		
D003 DP-SMA-0.6	21-021			Site or Limits for 21-021 are not on Site Map or map insert.
D003 DP-SMA-0.6	21-024(l)		O&G discussed in 1000.5.2.1. Confirm if PCB is POC.	
D004 DP-SMA-1	21-011(k)			Confirm flow direction arrows.
D004 DP-SMA-1	21-021			Site or Limits for 21-021 are not on Site Map or map insert.
D005 DP-SMA-2	21-021			see above
D005 DP-SMA-2	21-024(h)		O&G discussed in 1000.7.2.1. Confirm if PCB is POC.	
D006 DP-SMA-2.35	21-021			Site or Limits for 21-021 are not on Site Map or map insert.
D007 DP-SMA-3	21-013(c)			Site 21-013(c) not labeled on map.
D007 DP-SMA-3	21-021			Site or Limits for 21-021 are not on Site Map or map insert.
D008 DP-SMA-4	21-021			It is not clear what limits Drainage Area boundary.
Sandia Canyon Watersheds				
S001 S-SMA-0.25	03-013(a)	Not all of Site is within Drainage Area of sampler. Drainage area is substantially larger than Site. Sampler appears above culvert inlet. Outlet location of culvert not shown. It is not clear that location of sampler is sufficiently down gradient to be representative of pollutant sources (affected area) of Site.		
S001 S-SMA-0.25	03-052(f)	see above		
S003 S-SMA-2	03-012(b)			Sampler label is not shown on Site Map.
S005A S-SMA-3.52	03-021	It is not clear that flow from Site would be captured by sampler.		
S005B S-SMA-3.53	03-014(b2)	South area and majority of northeast area of Site is not within Drainage Area of sampler. Sampler is down gradient of some control measures. Reason for sampler location is not clear.		Confirm flow direction arrows.
S007 S-SMA-3.7	53-012(e)	Sampler is located near outlet of plugged drain line. It is not clear that location of sampler is sufficiently down gradient to be representative of pollutant sources (affected area) of Site.		
S008 S-SMA-3.71	53-001(a)			SDPPP Vol 2 1000.46.2.1, says SWMU 53-001(a) is an outdoor storage area. However, Site Map shows area as point. If updated information on site boundaries is available, then update SDPPP accordingly.

Permitted Feature SMA	Site	Sampler Location - Clarification or additional info that location is representative appears needed in SDPPP:	Pollutants of Concern - Clarification or addition of POCs appears needed in SDPPP:	Control measure maintenance / Other clarification or correction appears needed in SDPPP and/or Site Map:
S009 S-SMA-3.72	53-001(b)			Flow direction at edge of drainage area for sampler (as shown by arrows) is not clear. SDPPP Vol 2 1000.47.2.1 says SWMU 53-001(b) is an outdoor storage area. However, Site Map shows area as point. If updated information on site boundaries is available, then update SDPPP accordingly.
S013 S-SMA-5	20-002(c)	It is not clear how flow is being directed toward sampler.		
S014 S-SMA-5.2	20-003(c)	It is not clear how flow is being directed toward sampler.		
S016 S-SMA-6	72-001	See CEI Report. Sampler Location in Sandia Canyon may not provide representative monitoring for site. Drainage area of sampler is substantially larger than Site.		See CEI Report. Also, site boundaries originally shown as a small circle or point were increased in the updated site map. However, it was still unclear that the boundaries of the site and/or affected area match the description in the SDPPP.
Mortandad/Canada del Buey				
C001 CDB-SMA-0.15	04-003(a)			It is not clear that Site labels are correct on Site Map.
C001 CDB-SMA-0.15	04-004			see above
C002 CDB-SMA-0.25	46-004(c2)			It is not clear that Site Boundaries, map symbol or labels are correct on Site Map.
C003 CDB-SMA-0.55	46-004(e2)			It is not clear that Site Location or Boundaries are correct on Site Map. It is not clear that sampler collects flow from this Site. Confirm if site is monitored by C002 CDB-SMA-0.25.
C003 CDB-SMA-0.55	46-004(g)			Accumulated sediment above check dam C00306010017 below SWMU outfall was observed during field tour. Erosion of the asphalt lined drainage channel below check dams before culvert was also observed.
C005 CDB-SMA-1.15	46-004(b)			Confirm flow direction arrows above sampler and control measures.
C005 CDB-SMA-1.15	46-004(y)			Site boundaries are not shown on Site Map.
C005 CDB-SMA-1.15	46-004(z)			It is not clear that Site boundaries or labels are correctly shown on Site Map.
C005 CDB-SMA-1.15	46-006(d)			see above
C006 CDB-SMA-1.35	46-004(a2)			It is not clear that Site boundaries or labels are correctly shown on Site Map.
C006 CDB-SMA-1.35	46-004(u)			see above
C006 CDB-SMA-1.35	46-004(v)			see above
C006 CDB-SMA-1.35	46-004(x)			see above
C006 CDB-SMA-1.35	46-006(d)			see above
C007 CDB-SMA-1.54	46-006(d)			It is not clear that Site label is shown correctly.

Permitted Feature SMA	Site	Sampler Location - Clarification or additional info that location is representative appears needed in SDPPP:	Pollutants of Concern - Clarification or addition of POCs appears needed in SDPPP:	Control measure maintenance / Other clarification or correction appears needed in SDPPP and/or Site Map:
M003 M-SMA-3	48-007(c)	Sampler is located near outlet of storm drain/culvert. It is not clear that location of sampler is sufficiently down gradient to be representative of pollutant sources (affected area) of Site.		
M006 M-SMA-4	48-001			Site does not appear to be labeled properly on Site Map.
M008 M-SMA-6	35-016(h)			Not all of the control measure color M00808030002 is shown on Site Map (overlapped by M00807020013). Site boundaries appear different on M009. Update site boundaries as needed.
M012 M-SMA-10	35-014(e)		An area of oil-stained soil on the northern edge of Ten Site Mesa at TA-35 (SWMU 35-014(e)) is discussed in 1000.24.2.1. Confirm if PCB is POC.	
M013 M-SMA-10.3	35-014(e2)	Approximately 1/2 of Site is within drainage area of sampler. Drainage area of sampler is substantially larger than Site. It is not clear that sampler would collect flow from Site.		
M013 M-SMA-10.3	35-016(i)	It is not clear that sampler would collect flow from Site.		
M014 M-SMA-11.1	35-016(o)	One (1) of three areas of Site are shown within Drainage Area of sampler. It is not clear that sampler would collect flow from Site areas.		Confirm flow direction arrows.
T001 Pratt-SMA-1.05	35-003(r)			Southern portion of T00103020018 berm provides run on and sediment control. Accumulated sediment was observed behind berm during field tour. Confirm if additional berm height and/or maintenance needed.
T007 T-SMA-5	35-009(a)			Confirm flow direction arrows.
T010 T-SMA-7.1	04-001		HE discussed in 1000.64.2, but not in 1000.64.2.1 (POC) or 1000.64.5 (Plan).	
Pajarito Canyon Watersheds				
E003 2M-SMA-1.43	22-014(a)		HE discussed in 1000.3.2, but not in 1000.3.2.1 (POCs) or 1000.3.5 (Plan).	
E004 2M-SMA-1.44	06-001(b)		Solvents discussed in SDPPP site activities. Confirm if organics (SVC) are POCs.	
E005 2M-SMA-1.45	06-006		Electrical equipment discussed in SDPPP site activities. Confirm if PCB is POCs.	
E009 2M-SMA-1.7	03-055(a)	Sampler is located near Site. Drainage area for sampler is substantially larger than area of Site. Location of sampler does not monitor E0090312005 Berm. It is not clear that location of sampler is sufficiently down gradient to be representative of pollutant sources (affected area) of Site.		
E010 2M-SMA-1.8	03-001(k)		Confirm if organics (SVC) are POCs from oils described in Site activities.	

Permitted Feature SMA	Site	Sampler Location - Clarification or additional info that location is representative appears needed in SDPPP:	Pollutants of Concern - Clarification or addition of POCs appears needed in SDPPP:	Control measure maintenance / Other clarification or correction appears needed in SDPPP and/or Site Map:
E011 2M-SMA-1.9	03-003(a)		Confirm if PCB is POCs from electrical equipment oils described in Site activities.	
E015 2M-SMA-2.5	40-001(c)		Possible contaminants include solvents, inorganic chemicals, and HE discussed in 1000.14.2, but HE not included in 1000.14.2.1 (POCs) and 1000.14.5 (Plan). Confirm if organics (SVC) from solvents are POC.	
H001 3M-SMA-0.2	15-010(b)	Sampler is located near Site. It is not clear that location of sampler is sufficiently down gradient to be representative of pollutant sources (affected area) of Site.	HE discussed in 1000.16.2, but not in 1000.16.2.1 (POCs) and 1000.16.5 (Plan).	
H002 3M-SMA-0.4	15-006(b)	Sampler is located approximately 400 feet from Site. Drainage area of sampler is substantially larger than Site. Reason for sampler location is not clear.		
H005 3M-SMA-2.6	C-36-003			It does not appear that label location for Site is correct.
J001 PJ-SMA-1.05	09-013		HE (materials were "flash-burned to remove any HE, and deposited over the MDA M surface) discussed in 1000.25.2.1. Confirm if HE is POC.	
J003 PJ-SMA-3.05	09-004(o)		HE discussed in 1000.28.2, but not in 1000.28.2.1 (POCs) and 1000.28.5 (Plan).	
J004 PJ-SMA-4.05	09-004(g)		HE discussed in 1000.29.2, but not in 1000.29.2.1 (POCs) and 1000.29.5 (Plan).	
J005 PJ-SMA-5	22-015(c)	Reason for sampler location is not clear.		Site is not labeled on Site Map. Additional controls for steep slopes should be considered.
J006 PJ-SMA-5.1	22-016	Site is not within drainage area of sampler. It does not appear that site is up gradient of sampler.	HE, solvents, non-PCB oils, inorganic chemicals, acids, and photo processing chemicals discussed in 1000.31.2, but HE and organics not listed in 1000.31.2.1 (POCs) and 1000.31.5 (Plan and Schedule). Confirm if SVOCs are POC.	Location of Site may not be correct on Site Map based on information from on-site permittee representatives during field tour.
J008 PJ-SMA-7	40-006(c)	It is not clear how flow from drainage area is directed toward sampler. Reason for sampler location is not clear on Site Map.		It is not clear how fence would limit drainage area boundary.
J009 PJ-SMA-8	40-006(b)	Reason for sampler location is not clear on Site Map. Drainage area of sampler is substantially larger than Site.		
J012 PJ-SMA-10	40-006(a)	Reason for location of sampler not clear on Site Map. Not all controls monitored by sampler location.		It is not clear that berm would limit drainage area boundary.
J013 PJ-SMA-11	40-003(a)		HE discussed in 1000.37.2, but not in 1000.37.2.1 (POCs) and 1000.37.5 (Plan).	
J015 PJ-SMA-13	18-002(a)	Sites are shown within drainage area of sampler, but it is not clear how flow from Sites is directed to sampler.		

Permitted Feature SMA	Site	Sampler Location - Clarification or additional info that location is representative appears needed in SDPPP:	Pollutants of Concern - Clarification or addition of POCs appears needed in SDPPP:	Control measure maintenance / Other clarification or correction appears needed in SDPPP and/or Site Map:
J016 PJ-SMA-13.7	18-010(b)	Sampler location is near outlet of storm drain/culvert. It is not clear that location of sampler is sufficiently down gradient to be representative of pollutant sources (affected area) of Site.	Spillage from a refueling discussed in 1000.40.2, but organics are not listed in 1000.40.2.1 (POCs).	
J017 PJ-SMA-14	54-004			Site Map does not show cap J01708010001 (different symbol color than seed mulch).
J018 PJ-SMA-14.2	18-012(b)		Machine shop drains discussed in 1000.40.2, but organics are not listed in 1000.40.2.1 (POCs).	
J019 PJ-SMA-14.3	18-003(e)	Site is not within drainage area of sampler. It is not clear how sampler would capture any flow from Site.		There are no flow direction arrows on Site Map.
J028 STRM-SMA-1.05	08-009(f)	Sampler is located at outlet of storm drain/culvert below Site. It is not clear that location of sampler is sufficiently down gradient to be representative of pollutant sources (affected area) of Site.		
J031 STRM-SMA-5.05	09-013		HE (materials were "flash-burned to remove any HE, and deposited over the MDA M surface) discussed in 1000.25.2.1. Confirm if HE is POC.	
Water Canyon Watersheds				
V002 CDV-SMA-1.3	16-017(a)-99			No flow direction arrows to sampler on Site Map.
V002 CDV-SMA-1.3	16-026(m)			see above
V004 CDV-SMA-1.45	16-026(i)			No flow direction arrows on Site Map. It is not clear how berm would limit drainage area boundary.
V007 CDV-SMA-2.3	13-001			Sampler icon in or near "Fish Ladder Canyon" receiving stream is missing on Site Map.
V007 CDV-SMA-2.3	13-002			Some flow from this site is also captured in W012A W-SMA-8.71. POCs are the same. It appears that this Site should be in both W012A and V007. See comment for W012A.
V007 CDV-SMA-2.3	16-003(n)		HE discussed in 100.7.2, but not in 1000.7.2.1 (POCs) and 1000.7.5 (Plan).	see above
V007 CDV-SMA-2.3	16-003(o)		see above	see above
V007 CDV-SMA-2.3	16-029(h)		see above	
V008 CDV-SMA-2.41	16-018			Confirm flow direction arrows in western portion of site. It is not clear that check dams V00806030007 (Juniper Bales) would be of sufficient length or construction to direct flow as shown on Site Map.
V010 CDV-SMA-3	14-009	Reason that sampler is located approximately 1600 feet down gradient of Site is not clear.		
V012 CDV-SMA-6.01	14-001(g)	It is not clear that flow from Site would be captured by sampler. Reason for sampler location is not clear.		Confirm flow direction arrow east of Site.

Permitted Feature SMA	Site	Sampler Location - Clarification or additional info that location is representative appears needed in SDPPP:	Pollutants of Concern - Clarification or addition of POCs appears needed in SDPPP:	Control measure maintenance / Other clarification or correction appears needed in SDPPP and/or Site Map:
V013 CDV-SMA-7	15-008(d)	It is not clear that any flow from Site would be captured by sampler.		Confirm flow direction arrows. Flow arrows appear to show that run on is captured by berm and directed toward site which would not be appropriate.
V014 CDV-SMA-8	15-011(c)	Site is not within drainage area for sampler. It appears that sampler is up gradient of Site.		
V015 CDV-SMA-8.5	15-014(a)	It is not clear that flow from Site would be captured by sampler.		No flow direction arrows shown on map.
F001 F-SMA-2	36-004(c)	It is unclear on Site Map if sampler is within or on opposite side of Fence Canyon.		Other monitored SWMU/AOCs (not labeled) are shown in Drainage Area of sampler on Site Map. Need to confirm if Sites need to be labeled and included for this SMA.
I004A PT-SMA-2.01	C-36-001			C-36-001 not shown or otherwise indicated on Site Map.
I005 PT-SMA-3	36-004(a)	Flow from site is not captured by sampler before receiving water (Potrillo Canyon). Drainage area shown for sampler is substantially larger than Site.		SDPPP Vol 4, Pg 241, Section 1000.26 PT-SMA-3 refers to TA-33--confirm if TA-36.
I005 PT-SMA-3	36-006	see above		
I007 PT-SMA-4.2	36-004(d)	Flow from site is not captured by sampler before receiving water (Potrillo Canyon). Drainage area shown for sampler is substantially larger than Site.		
W001 W-SMA-1	16-026(v)			SDPPP Vol 4, Pg 258, Section 100.28.2.1 information on drainage for 16-026(v) not completed
W006 W-SMA-5	16-001(e)		HE discussed in 1000.33.2, but not in 1000.33.2.1 (POCs) and 1000.33.5 (Plan).	Site boundaries shown on W-SMA-5 site map originally included S-Site Canyon. Information on the affected area and/or area subject to corrective action should also be documented if site boundaries are reduced.
W006 W-SMA-5	16-003(f)		see above	see above
W006 W-SMA-5	16-026(b)		see above	see above
W006 W-SMA-5	16-026(c)		see above	see above
W006 W-SMA-5	16-026(d)		see above	see above
W006 W-SMA-5	16-026(e)		see above	see above
W008 W-SMA-7	16-026(h2)		HE discussed in 1000.35.2, but not in 1000.35.2.1 (POCs) and 1000.35.5 (Plan).	
W012A W-SMA-8.71	16-004(c)			It appears on Site Maps that some flow from 13-002 is captured by sampler W-SMA-8.71. Permittee would need to contact USEPA to confirm if a modification to Appendix B (listing Site 13-002 for both W-SMA-8.7 and W-SMA-8.71) is needed.
W013 W-SMA-9.05	16-030(g)			Confirm flow direction arrows.
W014 W-SMA-9.5	11-012(c)		HE discussed in 1000.42.2, but not in 1000.42.2.1 (POCs) and 1000.42.5 (Plan).	
W017 W-SMA-9.9	11-006(b)		HE discussed in 1000.45.2, but not in 1000.45.2.1 (POCs) and 1000.45.5 (Plan).	

Permitted Feature SMA	Site	Sampler Location - Clarification or additional info that location is representative appears needed in SDPPP:	Pollutants of Concern - Clarification or addition of POCs appears needed in SDPPP:	Control measure maintenance / Other clarification or correction appears needed in SDPPP and/or Site Map:
W018 W-SMA-10	11-005(a)		SDPPP 1000.46.2 discusses electrical equipment storage for site SWMU 11-005(a). Confirm if PCB is POC.	
W018 W-SMA-10	11-006(c)		HE discussed in 1000.46.2, but not in 1000.46.2.1 (POCs) and 1000.46.5 (Plan).	
W019 W-SMA-11.7	49-008(c)		HE discussed in 1000.47.2, but not in 1000.47.2.1 (POCs) or 1000.47.5 (Plan).	Confirm flow direction arrows.
W020 W-SMA-12.05	49-001(g)			If cap discussed in 1000.48.2 is a necessary control measure to minimize pollutants in stormwater under this Individual Permit, then the measure would need to be identified, described and shown on Site Map.
Ancho Canyon/Chaquehui Canyon Watersheds				
A001 A-SMA-1.1	39-004(a)	Reason for location of sampler not clear. Sites are not in Drainage Area shown for sampler. Sampler is also above runoff control W022 06 01 0003 Check Dam - Rock. A001 02 03 0001 (Established Vegetation) is a ponding area per Vol 5, Pg 24. If ponding area has outlet, then that may be a more representative location for sampler.		Confirm flow direction arrows.
A001 A-SMA-1.1	39-004(d)	see above		see above
A004 A-SMA-2.7	39-002(c)			Incorrect site map included in SDPPP for A-SMA-2.7 (see pg 51 of SDPPP Vol 5). A correct site map was available from a different on-line web link.
A004 A-SMA-2.7	39-008			see above
Q005 CHQ-SMA-4	33-011(e)			Confirm or provide more flow direction arrows.
Q008 CHQ-SMA-5.05	33-007(b)	Majority of Site is not within Drainage Area shown for sampler. It is not clear how flow is being directed. Reason for location of sampler is not clear.	HE not listed in 1000.19.2 and 1000.19.5 for 33-007(b), but is listed in 1000.20.2.1 (POCs) and 1000.20.5 (Plan).	Additional runoff or other control measures appeared needed in the north portion of site during field tour. Off-site inlet protection should also be considered. See comments for Q009 below.
Q009 CHQ-SMA-6	33-007(b)		See notes for Q008, CHQ-SMA-5.05, 33-007(b).	Discussion of 33-007(b), including location of engineered fill for 33-063, needs to be clarified in SDPPP (Q008 CHQ-SMA-5.05 and Q009 CHQ-SMA-6). The same language is used for two separate areas associated with the Site, but HE is not identified as pollutants of concern for each area. If engineered fill is a necessary control measure to minimize pollutants in stormwater under this Individual Permit, then the measure would need to be identified, described and shown on Site Map.