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Title: MS4 & IP Connection - PowerPoint Presentation

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Intended for: Communication with Los Alamos County on the pending MS4 storm water permit

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LANL Storm Water Management MS4 & IP Connection

May 20, 2015

Presentation Overview

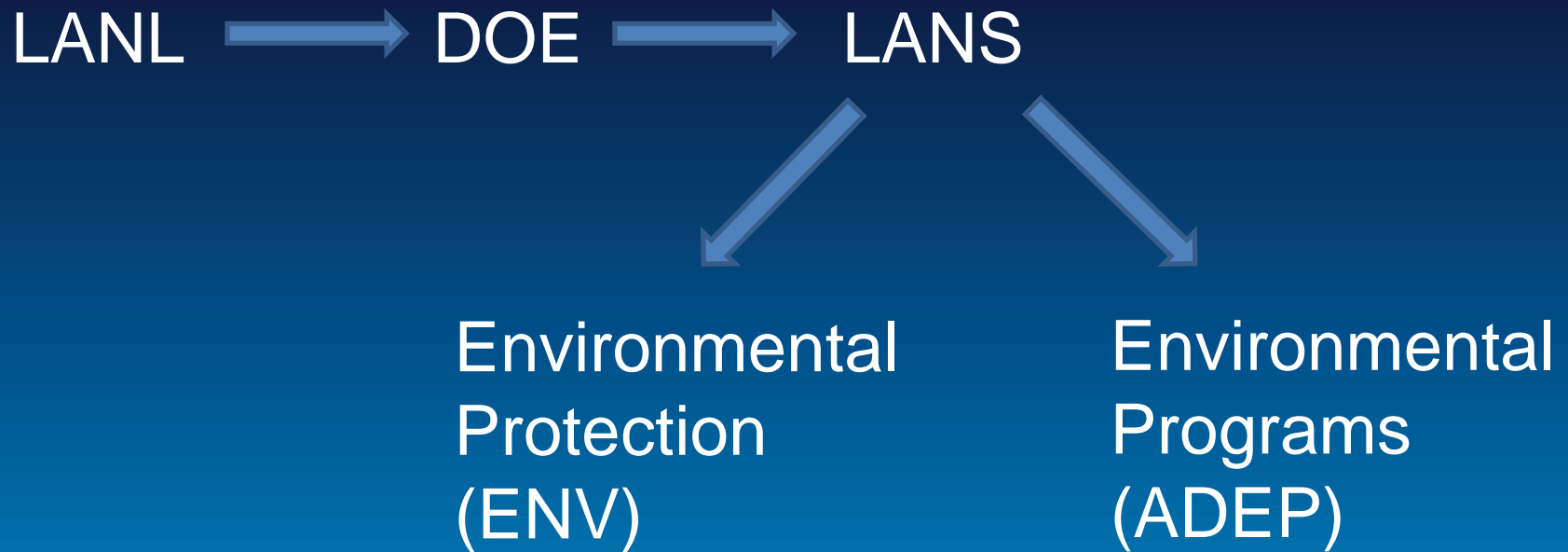
- MS4 – Municipal Separate Storm Sewer System
- IP – NPDES Storm Water Individual Permit

Objectives:

- Explain LANL management of storm water permits
- Briefly describe the IP
- Clarify how the MS4 relates to the IP

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LANL Environmental Structure



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LANL Environmental Organizations

Environmental Protection (ENV)

- Institutional Activities
 - Mission Support
 - Interface with regulators
- Institutional Compliance Oversight
 - NPDES Permits
 - NMWQCC Permits
 - RCRA Permit
 - Air Quality Permit

Environmental Programs (ADEP)

- Project Specific
 - Environmental Remediation
 - Transuranic Waste
- Project Implementation
 - Consent Order (legacy waste sites)
 - NPDES Individual Permit (legacy waste sites)

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LANL Storm Water POCs

- DOE
 - MS4
 - Gene Turner: 665-5794
 - Individual Permit
 - David Rhodes: 665-5325
- LANS
 - MS4 & Individual Permit
 - Terrill Lemke: 665-2397

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LANL NPDES Individual Permit

- A National Pollutant Discharge Elimination System (NPDES) permit (Permit # NM0030759)
 - Part of the CWA and regulated by EPA
 - LANS & DOE are co-permittees
 - Same regulatory structure as MS4
- IP regulates storm water discharges from specified Solid Waste Management Units (SWMUs) – “Sites”
 - Sites with potential to discharge contaminants to waters of the US
 - Sites are considered “point sources”
- 405 Sites (SWMUs)
- 250 Site Monitoring Areas (SMAs)

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Slide 6

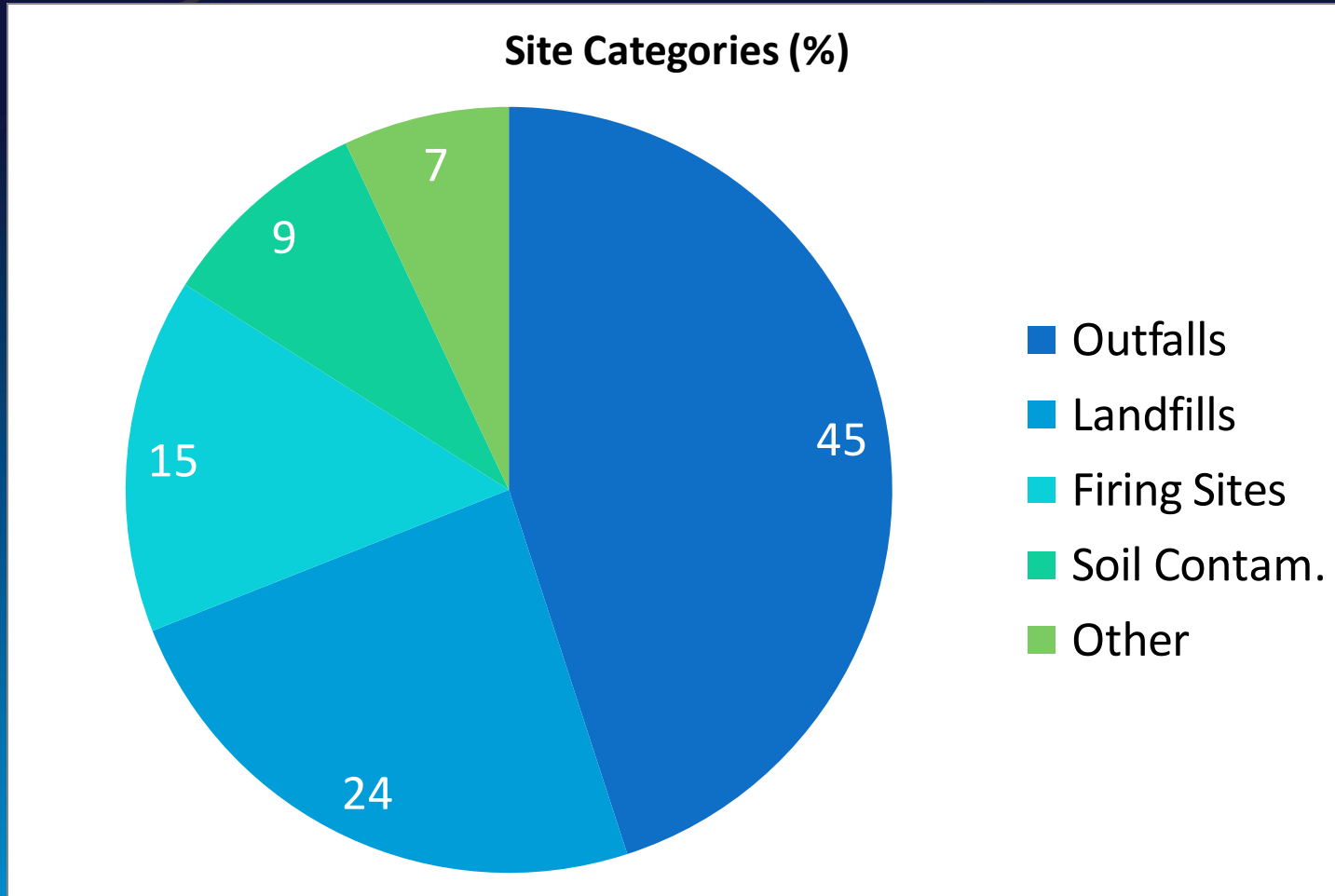
Individual Permit Overview

- “Site” Categories:
 - Former Outfalls (septic systems, sumps, floor drains)
 - Former Landfills, Disposal Sites, Material Storage Areas
 - Firing Sites
 - Potential Surface Soil Contamination
 - Other Sites

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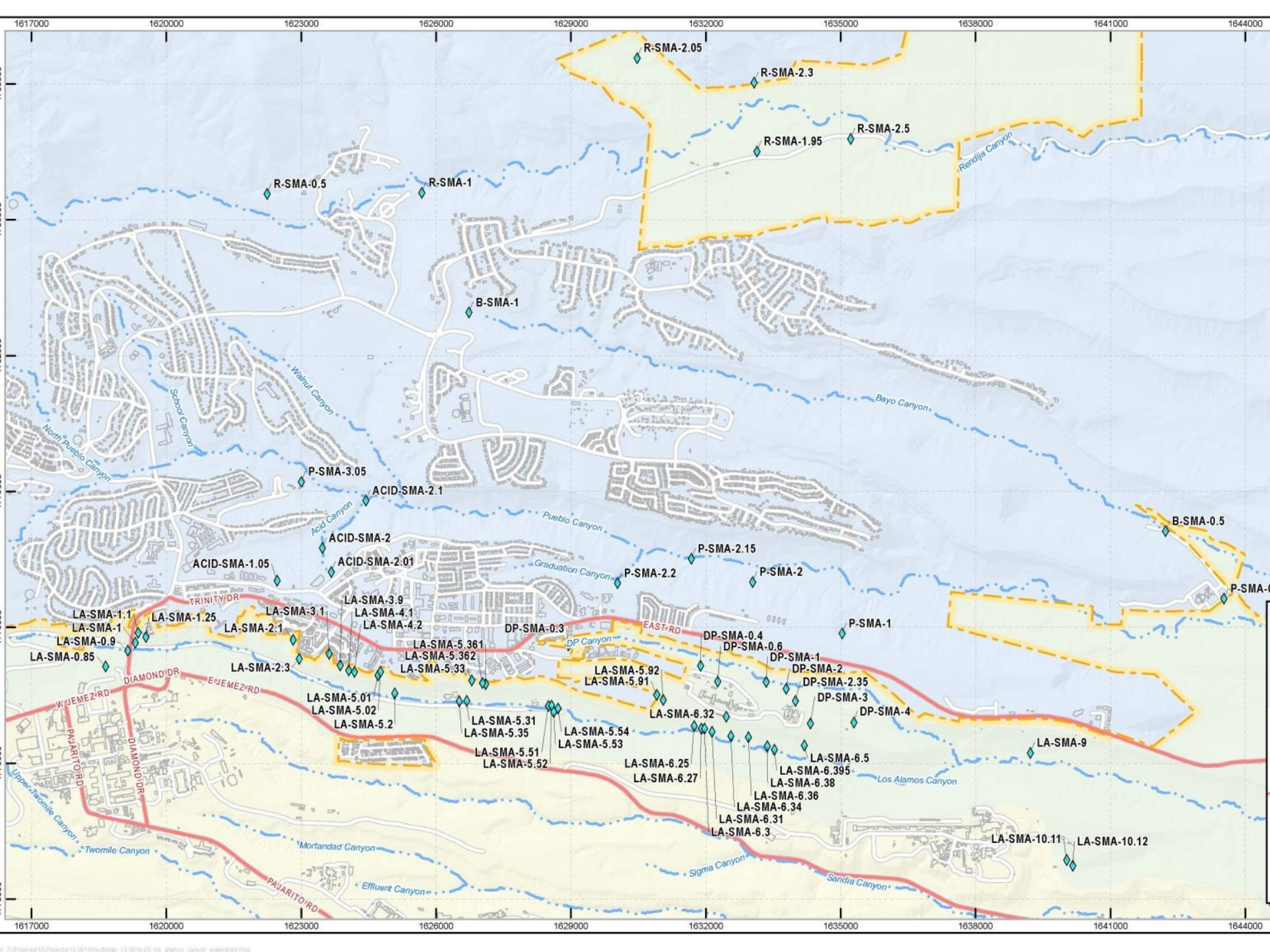
Slide 7

Individual Permit Overview



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Slide 8





South & West of Smith's Parking Lot
Former wastewater treatment plant
Former WWTP - Drains to IP Site in Acid Canyon

05/19/2015

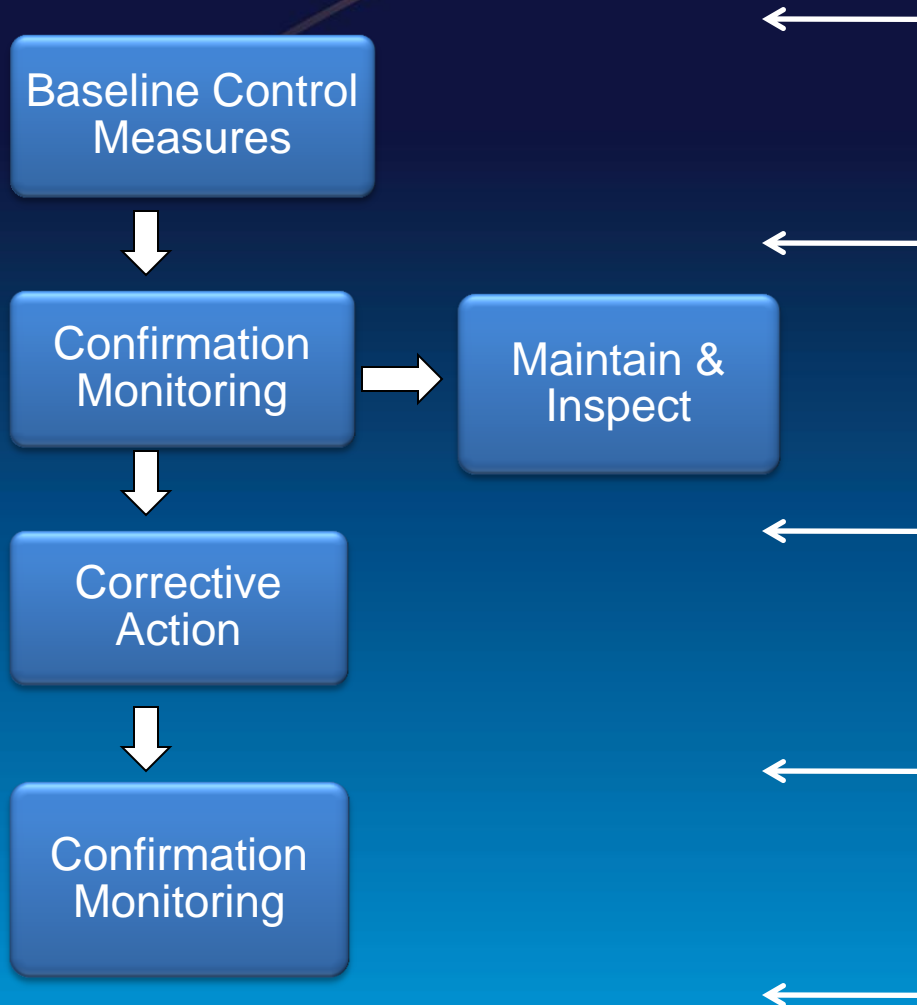
Major Elements of Individual Permit

- What's in the IP?
 - Control Measures
 - Confirmation Monitoring
 - Corrective Action
 - Site Discharge Pollution Prevention Plan (SDPPP)
 - Reporting
 - Inspections
 - Record Keeping
 - Public Involvement

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IP Implementation Process



- SDPPP Implementation
- Inspections
- Maintenance of Controls
- Reporting
- Public Involvement

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MS4 & IP Connection

- MS4 boundary will encompass multiple NPDES permit sites
 - Multi-Sector General Permit (industrial activity)
 - Construction General Permit
 - Individual Permit (405 SWMUs)
- Other NPDES permitted sites/facilities are separate from the MS4
- IP is the responsibility of DOE/LANS
- MS4 requirements apply to DOE/LANS, LAC, NMDOT

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MS4 & IP Connection

- Final MS4 boundary and details of the permit are unknown at this time
 - Extent of overlap with other NPDES permits (CGP, MSGP, IP) is unknown
- Per EPA: MS4 permit point of compliance is at the end of a MS4 (storm drain, conveyance), not in the canyon bottom or at an IP Site
- IP should have little to no impact on LAC MS4 compliance

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Questions??

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