



U.S. DEPARTMENT OF  
**ENERGY**

OFFICE OF  
**ENVIRONMENTAL  
MANAGEMENT**



# Individual Permit Revision

December 19, 2018

Steve Veenis  
Manager, Monitoring and Compliance  
N3B Los Alamos



**ENVIRONMENTAL MANAGEMENT**  
SAFETY ♦ PERFORMANCE ♦ CLEANUP ♦ CLOSURE



- New information is available
  - New soil characterization data 2014-2018
  - New IP storm water samples 2014-2018
  - Completed Data Quality Objective (DQO) process for legacy data – 2017
  - Completed Sampling Implementation Plan (SIP) process with New Mexico Environment Department (NMED) Surface Water Quality Bureau 2016-18
- Revise Application
  - Revise Form 2F
  - Update Supporting Materials section
  - Update data tables
  - Update Surface Monitoring Area maps
  - Update Proposed Changes section





## Benefits of Revised Application

- Remains protective of water quality
- Includes regulator and stakeholder input
- Creates clear corrective action pathways
- Develops well-defined endpoints
- Simplifies permit execution
- Includes Environmental Protection Agency (EPA) involvement





## Progress To Date

- Completed IP Permit Revision Communications Plan
- Completed Revised Application Work Plan
- Communication activities conducted
  - Initial stakeholder meeting in Santa Fe on September 26, 2018
  - Setup Basecamp document sharing website
    - Basecamp upload instructions
    - 90 Percent draft report on background threshold values (BTVs) for Pajarito Plateau storm water quality
      - New Mexico Environment Department and Communities for Clean Water comments
    - Biotic Ligand Model (BLM) Data Quality Objective/Data Quality Assessment Report from Supplemental Environmental Project data review of April 27, 2018
    - Proposed aluminum toxicity testing plan
    - Webinar presentation slides





## Completed Webinars

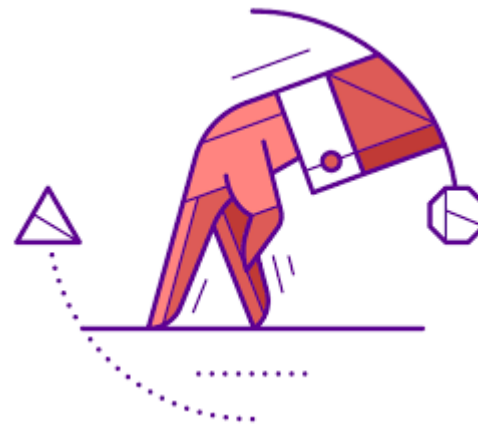
- Webinar #1 – Storm Water Background for Pajarito Plateau Storm Water
  - Discussion of results of 90 percent draft BTV report
- Webinar #2 – Biotic Ligand Model (BLM) and Aluminum Filtration
  - Discussion of BLM results for copper, lead, zinc, and aluminum toxicity plan
- Webinar #3 – IP Confirmation Monitoring
  - Discussion on potential Section C changes, SIP process and site-specific demonstrations
- Webinar #4 – IP Paths to Completion
  - Discussion on tiered approach, long-term stewardship, and site deletion
- Webinar #5 – IP Pending Requests to EPA
  - Discussion on status and path forward for alternative compliance requests, certificates of completion under Consent Order, and force majeure requests





## Path Forward

- Continue meeting with regulators and stakeholders – December 2018
- Submit revised application – January 2019
- Draft permit for public comment – May/June 2019
- State 401 certification - TBD
- Final IP issuance - TBD





U.S. DEPARTMENT OF  
**ENERGY**

OFFICE OF  
**ENVIRONMENTAL  
MANAGEMENT**



# Questions?



**ENVIRONMENTAL MANAGEMENT**  
SAFETY ♦ PERFORMANCE ♦ CLEANUP ♦ CLOSURE

Prepared by Los Alamos Legacy Cleanup Contractor N3B Los Alamos  
on behalf of DOE's Environmental Management Los Alamos Field Office

