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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 4, 2019

Doug Hintze, Manager
Environmental Management
U.S. Department of Energy
Los Alamos Field Office
P.O. Box 1663 MS M984
Los Alamos, NM 87545

**RE: APPROVAL
2019 MONITORING PLAN FOR LOS ALAMOS/PUEBLO WATERSHED
SEDIMENT TRANSPORT MITIGATION PROJECT
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-19-017**

Dear Mr. Hintze:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) *2019 Monitoring Plan for Los Alamos/Pueblo Watershed Sediment Transport Mitigation Project* (Monitoring Plan), dated and received April 29, 2019, and referenced by EM2019-0132. This document satisfies milestone #4 of Appendix B, Milestones and Targets, of the 2016 Consent Order, for fiscal year 2019.

In accordance with the 2016 Compliance Order on Consent, NMED and DOE has a pre-submittal meeting on February 6, 2019, to review DOE proposed changes for the 2019 monitoring year. The changes proposed in Section 5 of the Monitoring Plan are consistent with the changes previously agreed upon following the February 6, 2019 meeting.

NMED has completed its review and hereby approves the Monitoring Plan, with the following comments:

Comments

1. Section 2.0 Monitoring Geomorphic Changes, page 2

In the February 6, 2019 meeting, the DOE agreed to look at stream data from 2010-2018; and propose a definition of a large disturbance event in the 2019 Monitoring Plan. The DOE has included this information in Section 2.0 *Monitoring Geomorphic Changes* and in Figure 4.2-1, and have defined a large disturbance event as being greater than or equal to 300 cubic feet per second (cfs). The DOE states that this value is based on the median discharge of E030, E038, E039.1, E040, E042.1, E055, E055.5, and E056 from 2010-2018. NMED notes that the DOE has not included data from sampling locations E026, E056, E050.1 and E060.1 for this time period when calculating the median for a large disturbance event; if this data was included, it may result in a different value for the median discharge.

NMED recommends that DOE either adopt a lower threshold of 200 cfs to define a large disturbance event, or recalculate the median discharge and include data from E026, E056, E050.1 and E060.1 and provide this information to NMED prior to the next pre-submittal meeting.

2. Tables 4.2-4, 4.2-5, 4.2-6, 4.2-7, and 4.2-8 Sampling Sequence for Collecting Storm Water Samples, pages 30 -37

NMED notes that the start time to collect the samples is 10 minutes after the peak discharge height is reached on the field stormwater samplers (denoted as MAX +10). NMED is concerned that this delay in sample collection may not be representative. The DOE must provide justification of this sample collection method and ensure that the samples collected are representative.

The next annual monitoring plan must be submitted to NMED by no later than **April 30, 2020**. Should you have any questions or comments, please contact Siona Briley at (505) 476-6049.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc:

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LANL-19-017