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NEW MEXICO ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 9, 2019

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

RE:

REVIEW

2018/2019 ANNUAL LONG-TERM MONITORING STATUS REPORT LOS ALAMOS -COUNTY AIRPORT LANDFILL COVER SYSTEM REPLACEMENT SOLID WASTE MANAGEMENT UNITS 73-001(a,d) TECHNICAL AREA 73 LOS ALAMOS NATIONAL LABORATORY EPA ID#NM0890010515

HWB-LANL-19-043

Dear Mr. Hintze

The New Mexico Environment Department (NMED) has received the United States Department of Energy's (the Permittee) 2018/2019 Annual Long-Term Monitoring Status Report (July 2018 through June 2019) Los Alamos County Airport Landfill Cover System Replacement, Solid Waste Management Units 73-001(a,d), Technical Area 73 (Report) dated and received July 30, 2019, referenced by EM-LA-30AD-00479.

In accordance with the approved Long-Term Monitoring Plan, the Permittee submitted a monitoring report for the Los Alamos County Airport Landfill Replacement Cover System that describes the monitoring and inspection results from the previous four quarters (July 2018 through June 2019).

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The Permittee has indicated that methane monitoring will be reduced to semi-annual. The 2017 Long-Term Monitoring Plan for Los Alamos County Airport Landfill Cover Replacement, Solid Waste Management Units 73-001(a, d) Technical Area 73 (Plan), Section 2, Page 4, Paragraph 4, states "Should the levels of methane recorded during the initial two year monitoring period be below 25% of the lower explosive limit (LEL), the reported inspections shall be reduced to semi-annual for the next two years." NMED has reviewed the monitoring reports and notes that methane was recorded at zero percent of the LEL during the last two years (8 quarters) of monitoring. NMED concurs that the frequency of methane may be reduced to semi-annual in accordance with the schedule approved in the Plan.

The Report states that the evapotranspiration (ET) cover system is functioning as designed, and no damage to the cover was observed. DOE noted that some small rill erosion had formed on the eastern slope of the concrete retaining wall. NMED recommends that measures be taken to reduce further erosion at the eastern slope, and any measures taken should be documented and reported in the next annual monitoring report (2019/2020).

The next annual report, documenting monitoring and inspection results, must be submitted no later than **July 30**, **2020**, and annually by July 30th thereafter.

If you have any questions or comments regarding this letter, please contact Mitchell Schatz at (505) 476-6051.

Sincerely,

for John E. Kieling

Chief

Hazardous Waste Bureau

cc:

N. Dhawan, NMED HWB

S. Briley, NMED HWB

M. Schatz, NMED HWB

L. King, EPA Region 6

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File:

2019 LANL TA-73: 2018/2019 Annual Long-Term Monitoring Status Report for Los

Alamos County Airport Landfill Cover Replacement SWMU 73-001 (a,d)

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