



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

EMID-701412
Rec'd 5/3/21

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 3, 2021

Arturo Duran
Designated Agency Manager
U.S. Department of Energy
Environmental Management
Los Alamos Field Office
P.O. Box 1663 MS M984
Los Alamos NM 87544

RE: APPROVAL WITH COMMENTS
2020 SANDIA WETLAND PERFORMANCE REPORT
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-21-018

Dear Mr. Duran,

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) Environmental Management Los Alamos Field Office (EM-LA) *2020 Sandia Wetland Performance Report* (Report) dated and received March 3, 2021 and referenced by EMLA2021-0053. DOE has generally met its obligation to monitor the performance of the Sandia Canyon Wetland grade control structure (GCS) for 2020.

NMED has reviewed the Report and has the following general comments:

1. DOE reports that stormwater samples collected from gage station E123 (located below the GCS) did not appear to show a reduction in concentrations of constituents of concern (e.g., chromium VI, polychlorinated biphenyls, and polycyclic aromatic hydrocarbons) when compared to pre-GCS inputs due to streamflow during the truncated collection season (July-Nov 2020). The Report also states that discharge at E123 was only collected one time (8/2/2020) due to the truncated monitoring season

and reduced monsoon flows. DOE should continue to monitor the gage station E123 and if a similar trend is observed in 2021, DOE should propose an alternate approach.

2. A review of Figure 3.1-1 indicates that historically ten (10) cubic feet per second (cfs) flow appear to be uncommon for E123, with occurrences at less than two (2) times annually from 2015 to 2020. NMED recommends that in the future, the DOE review the trigger value for E123 and reduce the trigger value during the monitoring season to ensure that four samples are collected.
3. In Section 2.2.2 of the Report, DOE states that in January 2021, a programming error was discovered, and the alluvial water level transducers did not log data from October 31, 2020, resulting in a data gap of approximately two months. Section 2.2.3. of the Report provides additional detail on the root cause of this oversight; explaining that the periodic replacement of transducers was scheduled in July-August of 2020 but did not occur due to the fieldwork limitations associated with COVID-19. However, DOE should have prioritized maintenance of the monitoring equipment during fieldwork conducted in July 2020. Such oversight must be avoided in the future.
4. NMED notes that the two hard copies were not provided, and the 2020 Report does not include the data from the sediment sampling at the wetlands. In the future, DOE must ensure that the required numbers of copies and the complete data set are provided with the submittals in accordance with the Consent Order.

In 2019, DOE performed aerial-based geomorphological and vegetative monitoring and must continue to perform this monitoring every third year or if there is a significant storm event. No aerial-based geomorphological and vegetative monitoring was performed in the 2020 monitoring year.

In addition, DOE must continue to monitor the performance of the Sandia Canyon Wetland grade-control structure to ensure that the vegetation and geomorphology of the Sandia Canyon continues to remain stable.

NMED has completed its review and hereby approves the 2020 Report. The next annual performance report must be submitted no later than April 30, 2021.

If you have any questions regarding this letter, please contact Siona Briley (505) 690-5160.

Sincerely,

Kevin
Pierard

 Digitally signed by Kevin Pierard
Date: 2021.05.03 11:19:53 -06'00'

Kevin M. Pierard, Chief
Hazardous Waste Bureau

Cc:

N. Dhawan, NMED HWB
S. Briley, NMED HWB
C. Catechis, NMED DOE OB
S. Yanicak, NMED DOE OB
M. Green, NMED DOE OB
L. King, US EPA Region 6
C. Rodriguez, DOE-EM-LA
S. Veenis, N3B
E. Day, N3B
A. White, N3B
P. Maestas, N3B
W. Alexander, N3B
emla.docs@em.doe.gov
n3brecords@em-la.doe.gov

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