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Rec'd 10/20/21
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October 20, 2021

Arturo Duran, Designated Agency manager
U.S. Department of Energy
Environmental Management
Los Alamos Field Office
1200 Trinity Drive, Suite 400
Los Alamos, NM 87544

**RE: REVIEW:
2020-2021 ANNUAL LONG-TERM MONITORING STATUS REPORT (JULY 2020 THROUGH
JUNE 2021) FOR THE LOS ALAMOS COUNTY AIRPORT LANDFILL COVER SYSTEM
REPLACEMENT, SOLID WASTE MANAGEMENT UNITS 73-001(a,d) IN TA-73
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-21-039**

Dear Arturo Duran:

The New Mexico Environment Department (NMED) has received the United States Department of Energy's (DOE's) *2020-2021 Annual Long-Term Monitoring Status Report (July 2020 through June 2021) for the Los Alamos County Airport Landfill Cover System Replacement, Solid Waste Management Units 73-001(a,d) in Technical Area 73* (Report) dated and received July 30, 2021, and referenced by EM2021-0418.

In accordance with the approved Long-Term Monitoring Plan, the Permittee submitted the Report that describes the monitoring and inspection results from the previous four quarters (July 2019 - June 2020).

NMED has reviewed the Report and notes that no methane was detected in the semiannual methane monitoring. The Report states that the evapotranspiration (ET) cover system is currently in good condition and functioning as designed. NMED also notes that the surface crack observed in the last quarter of inspection in June 2020 was filled with loose soil from the surrounding area. The crack, linear and estimated at 1 inch wide and possibly 2 feet deep at its largest depth, extended approximately 150 feet from near survey grid point 34 to point 44, was first observed in March 2018 but was not visible in subsequent inspections. The Report states the surface crack appears to be stable and the backfill material has not subsided. The crack will

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continue to be monitored for any adverse effect to the ET cover system.

DOE has completed the initial five years (20 quarters) of monitoring. DOE recommends continuing monitoring until settlement completely stabilizes and furthermore, DOE states that continued measurements of water balance of the cover system should continue to provide defensible data for the continued use of ET covers for closures of sites in the Los Alamos area. DOE has proposed reducing the quarterly inspections to semiannual inspections, in the spring and the fall and that inspections would continue following significant precipitations events.

NMED has reviewed the DOE's proposal, and notes that the proposed changes to the monitoring schedule after the initial 5 years of monitoring, according to the March 2017 *Long-Term Monitoring Plan, Los Alamos County Airport Landfill Cover Replacement Solid Waste Management Units 73-001(a, d) Technical Area 73 (LTMP)*, Table 1, must be preceded by an Overall Performance of the Remedy Report and then a new reporting schedule can be proposed for NMED's review and approval.

The next annual report, documenting monitoring and inspection results, must be submitted no later than **July 30, 2022**. If you have any questions or comments regarding this letter, please contact Mitchell Schatz (505) 690-5910.

Sincerely,

Ricardo Maestas  Digitally signed by Ricardo Maestas
Date: 2021.10.20 11:51:41 -06'00'

Ricardo Maestas
Acting Chief
Hazardous Waste Bureau

cc:

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File: 2021 LANL, Review 2020-2021 Long-Term Monitoring Plan for Los Alamos Airport
Landfill SWMUs 73-001(a, d) LANL-21-039