



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us

ERID-522734



RYAN FLYNN
Cabinet Secretary-Designate

BUTCH TONGATE
Deputy Secretary

THOMAS SKIBITSKI
Acting Director
Resource Protection Division

EP2013-5126

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 7, 2013

Pete Maggiore
Environmental Operations Manager
Los Alamos Site Office
Department of Energy
3747 West Jemez Road, MS A316
Los Alamos, NM 87544

Jeffrey D. Mousseau
Associate Director, Environmental Programs
Los Alamos National Security, L.L.C.
P.O. Box 1663, MS 991
Los Alamos, NM 87545

**RE: DISAPPROVAL
2013 MONITORING PLAN FOR LOS ALAMOS AND PUEBLO CANYONS
SEDIMENT TRANSPORT MITIGATION PROJECT
LOS ALAMOS NATIONAL LABORATORY (LANL)
EPA ID #NM0890010515
HWB-LANL-13-016**

Dear Messrs. Maggiore and Mousseau:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) and the Los Alamos National Security L.L.C.'s (LANS) (collectively, the Permittees) *2013 Monitoring Plan for Los Alamos and Pueblo Canyons Sediment Transport Mitigation Project* (Plan), dated March 28, 2013 and referenced by LA-UR-13-21840/EP2013-0053. NMED has reviewed the Plan and hereby issues this disapproval.

In Section 3.0, the Permittees state, “[l]arge parts of the upper watersheds of Los Alamos Canyon and a major tributary, Guaje Canyon, were affected by the Las Conchas fire in 2011. As documented after the Cerro Grande fire (Gallaher and Koch 2004, 088747), storm water chemistry can be strongly affected by incorporation of ash from burn areas. To help evaluate the influence of the Las Conchas fire on storm water quality in 2011, americium-241 and cyanide were added to the analytical suites at E026 and E030, and cyanide was added to the analytical

Messrs. Maggiore and Mousseau

June 7, 2013

Page 2

suites at the other Los Alamos Canyon gages (E042.1, E050.1, and E109.9). Additionally, SSC measurements across the hydrograph were repeated at the upper boundary station at E026 to better characterize sediment flux from the burn area upstream from Laboratory sites. These modifications to the monitoring plan will continue in 2013.”

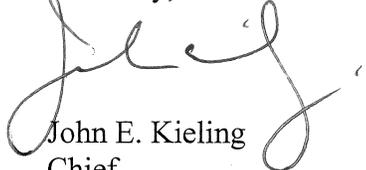
The Permittees’ statement that the modifications to the monitoring at E030 will continue in 2013 is not supported by the deletion of E030 from the monitoring plan with no indication nor justification. PCB levels at E030 have dropped significantly since the Las Conchas fire and must continue to be monitored for evaluation of the fire’s influence on storm water quality. The Permittees must reincorporate monitoring location E030 into the Plan.

In addition, the Permittees removed monitoring location E040 from the Plan with no indication nor justification in the narrative. The Permittees must reincorporate monitoring location E040 into the Plan or provide sufficient justification or its removal.

The Permittees must address the comments herein and submit a revised 2013 Monitoring Plan for Los Alamos and Pueblo Canyons Sediment Transport Mitigation Project by **June 21, 2013**. All submittals (including maps) must be in the form of two paper copies and one electronic copy in accordance with Section XI.A of the Order. In addition, submit a redline-strikeout version that includes all changes and edits to the Report (electronic copy) with the response to this Disapproval.

Please contact Ben Wear at (505) 476-6041 should you have any questions.

Sincerely,



John E. Kieling
Chief

Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
B. Wear, NMED HWB
S. Yanicak, NMED DOE OB, MS J993
T. Skibitski, NMED DOE OB
L. King, EPA 6PD-N
S. Veenis, MS M992
C. Rodriguez, DOE-LASO, MS A316

File: LANL '13, Los Alamos/Pueblo Canyons