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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

November 18, 2016

Doug Hintze
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Michael T. Brandt
Associate Director
Environment, Safety, Health
Los Alamos National Laboratory
P.O. Box 1663, MS M991
Los Alamos, NM 87545

**RE: APPROVAL WITH MODIFICATIONS
2015 SANDIA WETLAND PERFORMANCE REPORT
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-16-022**

Dear Messrs. Hintze and Brandt:

The New Mexico Environment Department (NMED) is in receipt of the United States Department of Energy (DOE) and the Los Alamos National Security, L.L.C.'s (LANS) (collectively, the Permittees) document entitled *2015 Sandia Wetlands Performance Report* (Report) dated April 2016, referenced by EP2016-0035, and received on April 28, 2016. NMED has reviewed the Report and hereby issues this Approval with the following modifications.

37809



MODIFICATIONS

1. Section 3.1, Analytical Results from Surface Water Gauging Stations E121, E122, and E123

Permittee's Comment: "The construction and subsequent re-vegetation of the Sandia [wetland] GCS and the implementation of monitoring were not undertaken with the objective of reducing concentrations of water contaminants to specific levels; therefore, the analytical results are not compared with water quality standards or other criteria for that purpose or for the purpose of evaluating compliance with regulatory requirements."

NMED Comment: The Report must include an evaluation and discussion of identified Sandia wetland chemicals of concern (COCs) (i.e. chromium, chromium VI, arsenic, polychlorinated biphenyls, and polycyclic aromatic hydrocarbons) for alluvial groundwater, storm water, and surface water with respect to the established applicable state and federal regulatory screening criteria. The results of COC screening must be discussed in all subsequent performance report submittals.

2. Section 3.4, Analytical Results from Surface Water Gauging Stations E121, E122, and E123

Permittee's Comment: "Field observations of the small side channel on the south side of reach S-2 indicated that a small amount of sandy gravel was deposited into the wetland (between 0.5 and 1[foot] ft deep), burying the bases of a small patch of cattails".

NMED Comment: For clarification, the Permittee must continue to monitor side channel aggradation at the wetland observed during the 2015 performance period. NMED must be informed of any additional significant side channel encroachment onto the wetland which occurs before the submittal of a Performance Period Report. If deemed necessary at the time, further aggradation across the wetland must be mitigated by the construction of an additional sediment run-on defense cell barrier or other appropriate barrier system.

3. Section 4.1, Key Monitoring Locations and Performance Metrics

Permittee's Comment: "It is proposed that an end date for annual reporting of the Sandia wetland performance monitoring be defined. The Laboratory proposes that monitoring continue through calendar year 2018, by which time a robust conceptual model for overall system performance that captures interannual variability can be proposed in the 2019 final performance report."

NMED Comment: The proposed reduced reporting schedule following submittal of the 2018 Performance Period Report may be discussed following NMED's review of the presented data. However, it should be noted that any determination by NMED regarding this matter will be based on the quality and consistency of the data collected; the implementation and performance of reliable sampling and data collection systems; documented wetland stability conditions; and the long term performance of the grade control structure.

4. Appendix E, Pilot Sampling Method Comparison, Section E-4.0- Summary

Permittee's Comment: "In summary, alluvial wells are the best methods of obtaining ample amounts of water with the most accurately preserved chemical and physical parameters in the Sandia wetland."

NMED Comment: NMED concurs with the Permittee's statement. The alluvial well system must be expanded to provide spatial coverage similar to the current wetland piezometer array as well as any other areas the Permittee has identified as key locations for further wetland characterization.

5. Chemical Analysis

NMED Comment: Although NMED had previously granted approval for the use of an internal analytical laboratory, future monitoring should utilize an accredited contract analytical laboratory. The new Consent Order, effective June 24, 2016, states "DOE should submit all samples for laboratory analysis to accredited contract laboratories. The laboratories should use the most recent EPA and/or industry accepted extraction and analytical methods for chemical analyses for target analytes as the testing methods for each medium sampled" (Consent Order Appendix F, Section I.C., Chemical Analysis). All future monitoring reports and work plans should comply with 2016 Consent Order analytical laboratory specifications.

The Permittee must consider these comments for the next submittal of the Sandia Wetland Performance Report.

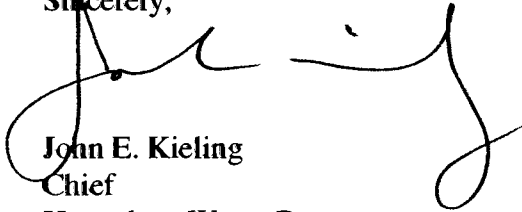
Messrs. Hintze and Brandt

November 18, 2016

Page 4

If you have any questions regarding this letter, please contact Gabriel Acevedo at (505) 476-6043.

Sincerely,



John E. Kielling

Chief

Hazardous Waste Bureau

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File: 2016 LANL and Reading, Approval with Mods 2015 Sandia Wetland Performance Report
LANL-16-022