16

Los Alamos
NATIONAL LABORATORY
EST 1943

Environmental Programs
P.O. Box 1663, MS M991
Los Alamos, New Mexico 87545
(505) 606-2337/FAX (505) 665-1812

National Nuclear Security Administration
Los Alamos Site Office, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544
(505) 667-4255/FAX (505) 606-2132

Date: DEC 18 2012
Refer To: EP2012-0290

John Kieling, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Submittal of the Erosion Controls Associated with Fishladder Canyon [Solid Waste Management Unit 16-003(o)]

Dear Mr. Kieling:

This letter documents storm water management following mitigation activities at Solid Waste Management Unit (SWMU) 16-003(o), within Fishladder Canyon. This letter is required as part of the New Mexico Environment Department's (NMED's) approval with modifications for the Phase II investigation report for the Technical Area 16 (TA-16) 340 Complex, Revision 1, dated February 9, 2009.

Storm water controls were installed during Phase II investigation activities conducted in July 2008 on the mesa top and north-facing hillslope draining into Fishladder Canyon and in the main Fishladder Canyon drainage. The controls included straw wattles on the mesa top, hillslope, and access road (see attached Figures 1 to 8) and were designed to control surface erosion and sediment transport by establishing a permanent vegetation cover.

Subsequent to NMED's February 9, 2009, approval letter, the U.S. Environmental Protection Agency (EPA) issued Los Alamos National Laboratory's National Pollutant Discharge Elimination System Stormwater Individual Permit (Permit No. NM0030759). This Individual Permit (IP), which became effective on November 1, 2010, regulates storm water discharges from SWMUs and areas of concern; SWMU 16-003(o) is one of the SWMUs included in the IP. The storm water controls installed during the Phase II investigation have been incorporated into the Site Discharge Pollution Prevention Plan required by the IP and include straw wattles and berms along the upper slope and along the Fishladder Canyon access road and a rock check dam and a gabion structure in the main drainage channel, all of which were designed to reduce flow velocities and sediment transport. The straw wattles installed on the steep slope at the former Fishladder location have been retired in place; the slope had been stabilized, and the wattles were no longer needed.

Storm water controls at the SWMU are inspected under the IP program at least once per year to evaluate if conditions that affect erosion have changed and when a significant event occurs (such as a wildfire) that could significantly affect runoff. Controls are also inspected after significant rainfall events and in the event that sampling results exceed IP target action levels. Inspections and associated maintenance activities are documented in the IP annual report submitted to EPA by March 1 each year.

Controls at this SWMU were inspected three times this year: during one annual erosion evaluation and between June and October 2012, following three separate rain events:

1. An annual erosion evaluation was completed on June 5, 2012, and one wattle was retired because the immediate area had stabilized and the wattle was no longer needed.
2. A rain event inspection was completed on July 17, 2012, with no findings or maintenance issues.
3. A second rain event inspection was completed on October 9, 2012. One wattle had been damaged and was subsequently repaired on October 17, 2012.

Figures 1 to 8 show the condition of the controls at the Fishladder in 2012.

The sampler for the Fishladder Canyon did not collect any samples in 2012, so no action level exceedances occurred, and therefore, no related inspections were conducted.

The erosion control inspection, maintenance, and reporting requirements contained in NMED's February 9, 2009, approval letter are now duplicative of requirements contained in the IP. Therefore, the U.S. Department of Energy and Los Alamos National Security, LLC, request that the requirement to submit a summary report by December 31 each year be terminated effective 2013.

If you have any questions, please contact Steve Veenis at (505) 667-0013 (veenis@lanl.gov) or Woody Woodworth at (505) 665-5820 (lance.woodworth@nnsa.doe.gov).

Sincerely,

Jeff Mousseau, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,

Peter Maggiore, Assistant Manager
Environmental Projects Office
Los Alamos Site Office

JM/PM/CD/SV:sm

Enclosures: Two hard copies with electronic files – Erosion Controls Associated with Fishladder Canyon [Solid Waste Management Unit 16-003(o)] (LA-UR-12-26833)

Cy: (w/enc.)
Woody Woodworth, DOE-LASO, MS A316
Steve Veenis, EP-CAP, MS M997
Public Reading Room, MS M992 (hard copy)
RPF (electronic copy)

Cy: (Letter and CD and/or DVD)
Laurie King, EPA Region 6, Dallas, TX
Steven Rydeen, San Ildefonso Pueblo
Joe Chavarria, Santa Clara Pueblo
Steve Yanicak, NMED-DOE-OB, MS M894
Mark Everett, EP-ET (w/ MS Word files on CD)
Wendy Staples, EP-BPS, MS M992

Cy: (w/o enc.)
Tom Skibitski, NMED-OB (date-stamped letter emailed)
Annette Russell, DOE-LASO (date-stamped letter emailed)
David Rhodes, DOE-LASO (date-stamped letter emailed)
Craig Douglass, EP-CAP (date-stamped letter emailed)
Jeff Mousseau, ADEP (date-stamped letter emailed)

FIGURES

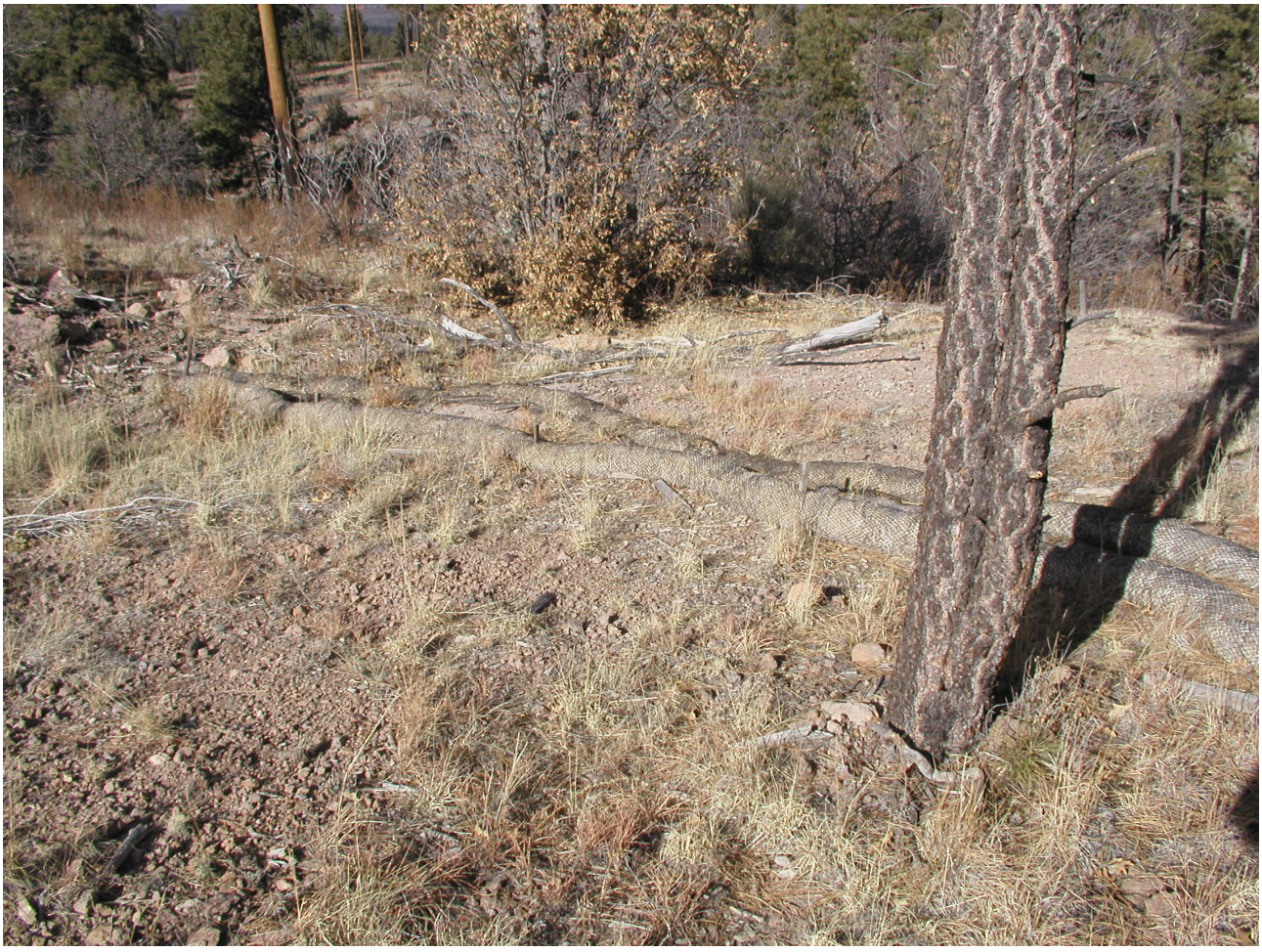

Figure 1 Wattles at the top of drainage into Fishladder Canyon (2012)

Figure 2 Wattles at the top of drainage into Fishladder Canyon (2012)

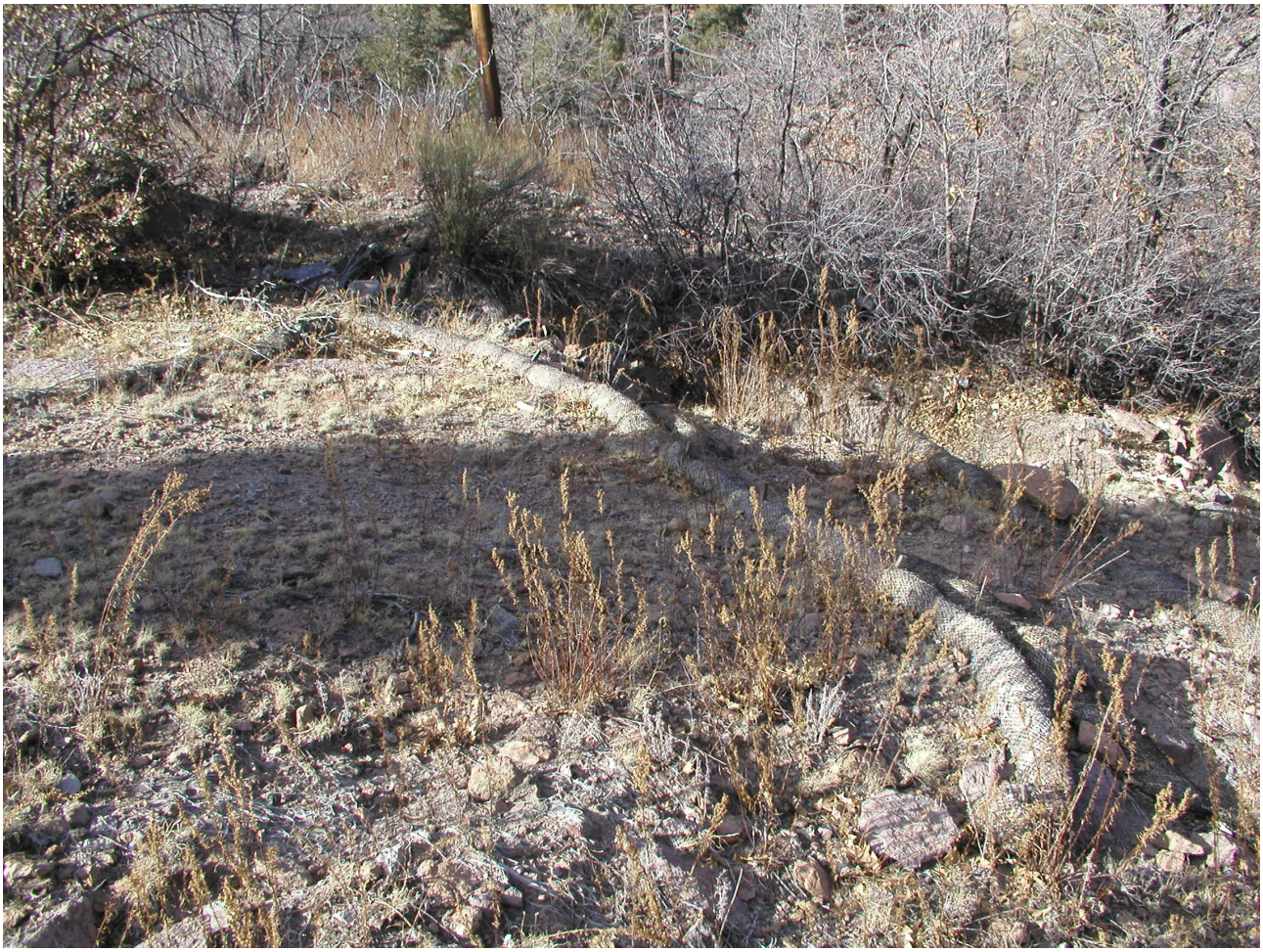

Figure 3 Wattles at the top of drainage into Fishladder Canyon (2012)

Figure 4 View looking downslope from mesa top into Fishladder Canyon (2012)

Figure 5 View looking upslope out of Fishladder Canyon (2012)

Figure 6 View east on access road into Fishladder Canyon (2012)

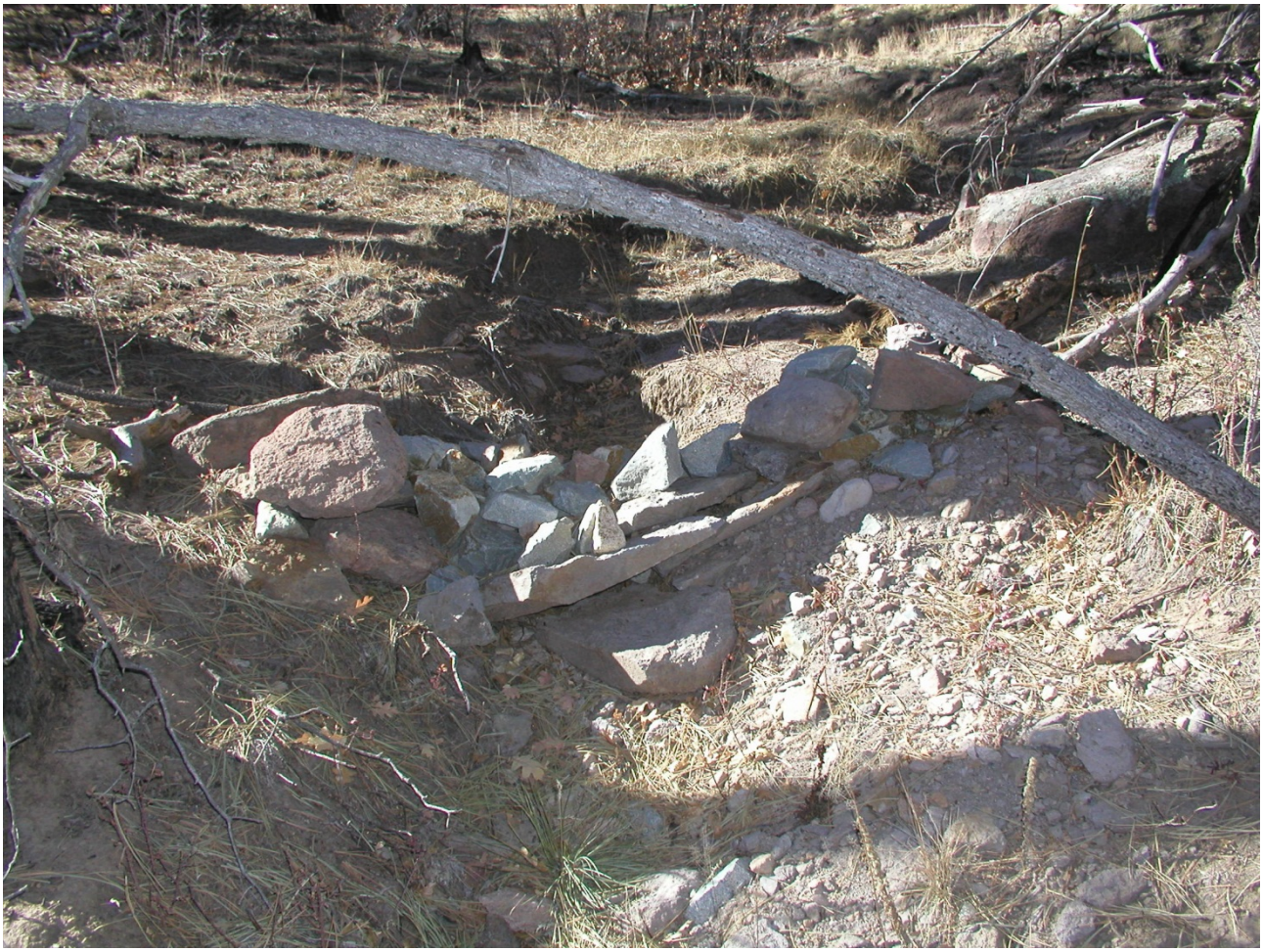

Figure 7 Rock check dam in the bottom of Fishladder Canyon (2012)

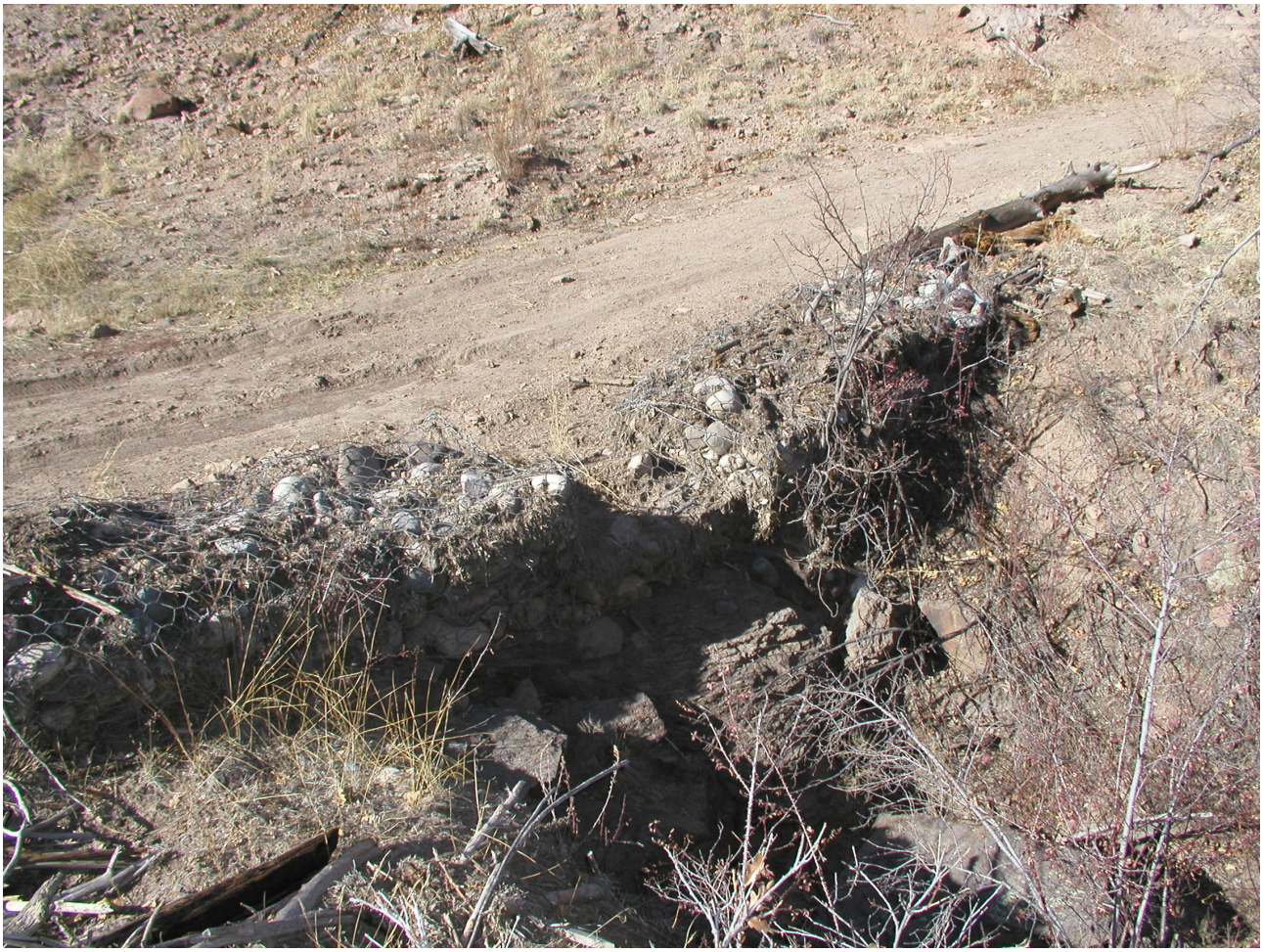

Figure 8 Gabions at the crossing of the access road in Fishladder Canyon (2012)