



BILL RICHARDSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us



RON CURRY
SECRETARY

DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

September 2, 2004

David Gregory, Federal Project Director
Los Alamos Site Office
Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, NM 87544

G. Pete Nanos, Director
Los Alamos National Laboratory
P.O. Box 1663, Mail Stop A100
Los Alamos, NM 87545

**RE: NOTICE OF APPROVAL WITH MODIFICATIONS OF PHASE II WORK
PLAN FOR LOS ALAMOS SITE OFFICE TA-73 AIRPORT LANDFILL
SWMU – 73-001(a-d)
LOS ALAMOS NATIONAL LABORATORY NM0890010515
NMED TASK LANL-04-007**

Dear Messrs. Gregory and Nanos:

The New Mexico Environment Department (NMED) has reviewed the Department of Energy's response to notice of disapproval dated July 30, 2004 for the "Phase II Work Plan for Los Alamos Site Office SWMU-73 Airport Landfill" (Work Plan) referenced by NW-ID-2004-031. This letter constitutes a notice of approval with modifications for the above referenced work plan with the understanding that the Regents of the University of California and the Department of Energy (collectively the "Permittees") satisfactorily address all of the comments listed below within 30 days of receipt this letter. If the Permittees do not provide the requested information or implement the requested changes to the Work Plan the approval will be rescinded. The Permittees shall provide the requested information as substitute pages to the original Phase II Work Plan.

1. Section 2.0 Detailed Engineering Design, page 3: The Work Plan calls for a RCRA Subtitle D municipal landfill cover as described by NMAC 20.9.1.306 regulations. The Permittees shall make the following modifications to work plan: Layer 1 shall consist of 12-inches of topsoil Soil Texture No. 8, Layer 2 shall consist of 24-inches of soil with a (permeability) K=1E-06 to 5E-06 cm/sec, all other components of the landfill cover shall remain as originally proposed in the Work Plan.



2. The Permittees must submit all Land Fill Gas (LFG) monitoring results to the NMED. The proposed Work Plan states that "engineering calculations indicated that gas concentrations will not exceed 25 percent of the LEL for methane." The Permittees must provide any engineering calculations used to the project concentrations of LFG.
3. Appendix A, Hydraulic Calculations section, sheet 3 of 25 shows that the analysis using the TR 55 Model was based upon a two-year 24-hour storm event. 40 CFR Section 258.26(a)2 requires that the model be based on a 24-hour, 25-year storm. The Permittees shall provide the analysis for a 24-hour, 25-year storm for both shear force and erosive force on the proposed landfill cover.
4. Appendix A, page 02200-5, Paragraph C Earthwork Quality Control specifies that the landfill cover will have a final compaction of 98 percent. The Permittees shall use suitable soil material in Layer 2 of the landfill cover, which is capable of achieving the required permeability without being compacted in excess of 90%.
5. Appendix A, Drawing Nos. 2006, 2007 and 2008, page 5-3: The Permittees must revise the notes on each of the referenced drawings to describe the relevance/significance of the 1962 Ground Surface line.
6. Appendix A, Hydraulic Calculations, sheet 1 of 25: The Permittees must correct all references to slopes and present the information as both percent slope and as a H:V ratio throughout the Work Plan.
7. Appendix A, Hydraulic Calculations, Drainage Structures Hydraulic Design, sheet 1 of 25: The Permittees must reconcile all discrepancies with regard to rip-rap and revise the text, table, and figures, accordingly.
8. Appendix A, Hydraulic Calculations, Drainage Structures Hydraulic Design, sheet 7 of 25: The Permittees must reconcile the design discharge for the inlet/outlet and revise the control check computations, accordingly.
9. Appendix A, Settlement Evaluations, Differential Settlement Evaluation, sheet 5 of 8: The Permittees must revise the Work Plan and provide a drawing or a figure that clearly identifies the existing ground surface.
10. Appendix A, Slope Stability, Global Slope Stability, sheet 5 of 5: The last sentence on this page states that the stability of slopes during construction was addressed in a separate memo. The Permittees shall provide the results of the separate slope analysis.
11. Appendix B, Construction Plan, Section 9.6, Dust Control, page 19: The dust control procedures are deficient. The Permittees must revise the Work Plan to include real-time

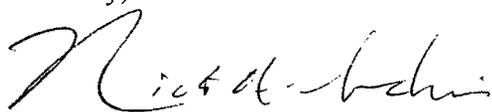
Messrs. Gregory and Nanos
September 2, 2004
Page 3

monitoring to discern a 25 percent reduction in visibility due to dust and establish a procedure to appropriately mitigate the emissions.

12. Appendix B, Construction Plan, Section 9.10, Housekeeping, page 21: The Permittees must incorporate litter control procedures into the Work Plan specifications including placement of an interim cover.

Should you have any questions, please feel free to contact me at (505) 428-2539.

Sincerely,



Nick Schiavo
Project Leader
Hazardous Waste Bureau

cc: D. Goering, NMED HWB
E. Hansen, NMED SWB
C. Voorhees, NMED DOE OB
S. Yanicak, NMED DOE OB, MS J993
L. King, EPA 6PD-N
J. Vozella, DOE LASO, MS A316
R. Enz, DOE LASO, MS A316
B. Ramsey, LANL RRES/DO, MS M591
N. Quintana, LANL E/ER, MS M992
D. McInroy, LANL E/ER, MS M992
file: Reading and LANL: TA-73 and Land Transfer