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DEPARTMENT OF ENERGY
National Nuclear Security Administration
Los Alamos Field Office
Los Alamos, New Mexico 87544



CERTIFIED MAIL-RETURN RECEIPT REQUESTED

DEC 12 2013 RECEIVED

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

DEC 16 2013

NMED
Hazardous Waste Bureau

Dear Mr. Kieling:

Subject: Formal Notification of Methane Levels at 100 Percent of the Lower Explosive Limit at Vent Risers along the North Edge of the Los Alamos Airport Landfill Cap and Request for a Waiver of the Implementation of an Active Gas Collection using Blowers

This letter's purpose is to provide formal notification to the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) of Methane levels at 100 percent of the Lower Explosive Limit (LEL) at vent risers along the north edge of the Los Alamos Airport Landfill cap and to request NMED's approval of a waiver from the implementation of an active gas collection system using blowers.

The increased methane levels were in direct response to an extreme set of precipitation (500-year event) that exceeded the design criteria. The existing cover system includes a passive layer beneath the Matcon product (gravel layer) that is highly permeable and allows for gas to migrate and vent to the atmosphere. Methane levels are expected to decline within the acceptable levels in the next few months without the need to implement any additional measures. Therefore, the requirement of active gas collection system in the April 2006 Post-Closure Care and Monitoring Plan for the Los Alamos Field Office Technical Area 73 (TA-73) Los Alamos Airport Landfill may not be necessary and we request a waiver from NMED.

The following actions have been implemented to ensure protection of public health, welfare and the environment:

1. Immediately notified the Airport Manager who then posted signs that indicated danger of methane levels, and instituted administrative controls including preventing access, removing vehicles, and implementing no idle provisions near the area of concern;
2. On October 23, 2013, NMED-HWB was informally notified of the methane at 100 percent of the LEL levels at the vent risers as documented through an email from R. Massey to M. Dale, which also provided a copy of the Landfill Gas Monitoring Third Quarter report, Los Alamos National Security, LLC, dated October 22, 2013;
3. Weekly gas monitoring was immediately instituted and will continue until the methane levels drop below the 100 percent LEL; the monitoring frequency can be changed to monthly for a period of six months on the risers and spinners; and
4. Quarterly gas monitoring of the entire site would continue as required, as well as the monthly landfill inspections.

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5. Design options are being evaluated to address current cover deficiencies and ensure that the cover system performs and complies with all regulatory requirements in the future.

The yearly report to NMED-HWB due on February 14, 2014 will include all data collected including the newly implemented weekly and monthly gas monitoring. At this time, we would inform NMED-HWB of any needed adjustments to our gas monitoring intervals based on the performance of the existing cover system.

If you have comments or questions, please contact Ramoncita Massey of my staff at (505) 665-7771.



David S. Rhodes
Federal Project Director
Environmental Projects Office

cc :

Dave Cobrain

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

Neelam Dhawan

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

Siona Briley

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

Michael Dale

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

T. Haagenstad, ADEP, LANS, MS-M992
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