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ENVIRONMENT



**NEW MEXICO
ENVIRONMENT DEPARTMENT**



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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

January 8, 2015

Peter Maggiore
Assistant Manager, Env. Projects Office
Los Alamos Field Office, DOE
3747 West Jemez Rd, MS A316
Los Alamos, NM 87544

Michael Brandt, Associate Director
Environment, Safety, and Health
Los Alamos National Security, L.L.C.
P.O. Box 1663, MS M991
Los Alamos, NM 87545

**RE: PRE-DESIGN WORK PLAN
LOS ALAMOS COUNTY AIRPORT LANDFILL
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-14-060**

Dear Messrs. Maggiore and Brandt:

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) Pre-Design Work Plan Los Alamos County Airport Landfill (Pre-Design Work Plan) dated September 26, 2014, and received October 1, 2014.

In the Pre-Design Work Plan, the Permittees state that they plan to "replace the landfill cover with a monolithic soil cover referred to as an Evapotranspiration (ET) cover which will meet the requirements as described in 40 CFR 264, Subpart N"; in lieu of an active gas collection system using blowers. The Permittees have requested NMED's approval to not implement an active gas collection system and instead continue to utilize the passive gas collection system, which will remain in place and continue to be monitored until the construction begins on the replacement of the current landfill cover. NMED has reviewed the Pre-Design Work Plan and hereby approves the Permittees' request not to conduct active gas collection at the unit at this time with the following comments:



NMED General Comments:

1. The final cover design must demonstrate (through modeling and calculations) that the ET cover will be able to accommodate snowmelt and freeze-thaw cycles during winter and early spring when vegetation is dormant. The Permittees must propose institutional or engineering controls that will prevent snowplows from stacking snow from the airport runway on top of the ET cover in order to reduce snowmelt on the ET cover.
2. The Permittees must provide an evaluation of gas emissions from the landfill and their impact on the ET cover and vegetation.
3. The Permittees must ensure that the volatile organic compound (VOC) sampling methods adhere to the most current EPA sampling methods.
4. The Permittees must include information on how the model input parameters (*e.g.*, meteorological assumptions) were selected or calculated for the final cover design.
5. The Permittees propose a monolithic ET cover system. Due to the scarcity of suitable cover soil in the Los Alamos area, the Permittees should consider a capillary barrier ET cover system, since the capillary barrier ET cover system requires less soil than the monolithic cover system to achieve the same water retention.

The Permittees must address the above comments in the forthcoming Work Plan for the final cover design. The Permittees must receive an approval of the Work Plan from NMED prior to placement of the ET cover.

If you have any questions regarding this letter, please contact Siona Briley at (505) 476-6049.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

Cc with Enclosure:

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