



MEMORANDUM

DATE: August 21, 2001

TO: Airport Landfill High Performing Team Members (Terry Rust, Vickie Maranville, Darlene Goering, David Gregory, and Steve Calhoun)

FROM: Bret Lucas, New Mexico Environment Department, Surface Water Quality Bureau

Re: Interim Measure Plan for Los Alamos Airport Landfill Drainage Areas Associated with or Adjacent to SWMU 73-001(a)

Having participated in the Airport Landfill high performing team (HPT) meetings and reviewed documents related to SWMU 73-001(a) the New Mexico Environment Department, Surface Water Quality Bureau (SWQB) supports the use of an Interim Measure (IM) for the removal of debris from several Pueblo Canyon drainages located immediately downgradient from the mesatop airport landfill area. SWQB additionally recognizes the need to conduct drainage cleanup and removal activities and the unique problems associated with the landfill drainage debris removal. Accordingly, SWQB submits the following comments.

The "Ground and Surface Water Quality Protection Regulations, 20.6.2.2201 NMAC (12/1/1995)", state in part:

[n]o person shall dispose of any refuse in a natural watercourse or in a location and manner where there is a reasonable probability that the refuse will be moved into a natural watercourse by leaching or otherwise...

"Watercourse" is defined in Subpart ZZ of 20.6.2.7 NMAC as:

...any river, creek, arroyo, canyon, draw, or wash, or any other channel having definite banks and beds with visible evidence of the occasional flow of water;

While the landfill drainages are, by definition, "natural watercourses" and contain refuse in and around them, SWQB acknowledges that mitigating circumstances may represent a significant obstacle to complete removal of this refuse and debris. These mitigating circumstances as identified by site visits, communications among Airport Landfill HPT members, and related documents, include but are not necessarily limited to:

1. Steep gradients in some areas may make removal of debris hazardous to worker health and safety.



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2. Removal of debris that is lodged within geologic materials may present a hazard to worker safety and health. Extraction of such debris may also create conditions that lead to destabilization of the watercourse debris.
3. Removal of debris that is largely or completely buried in sediment may contribute to destabilization of the watercourse. Removal of the refuse may, in some cases, result in increased erosion potential.

In considering the above mitigating factors, SWQB believes the IM associated with the landfill drainages should proceed, provided the following criteria and guidance are met.

1. In general, all debris should be removed from the landfill drainages with the exception of tires and clean (i.e., uncontaminated) concrete debris that meet the requirements outlined in detail below. Because physiochemical characteristics of tires and concrete have been shown to be relatively innocuous and not likely to contribute to degradation of water quality, sufficient justification is provided to allow such items to remain in place under certain circumstances. Requests to leave other debris (such as, but not limited to, drums, metal, car bodies, appliances, wooden debris, and various other refuse and debris) in or near the drainages, for reasons dictated by the mitigating circumstances as specified above, will be addressed on a case-by-case basis.
2. All tires and concrete debris should be removed except those items that demonstrate no potential to migrate within the drainages. Tires and concrete debris that, in the judgment of the site manager and/or SWQB representative, may potentially migrate are to be removed.

Please note that the drainages associated with SWMU 73-001(a) and IM activities conducted within the drainages are subject to the requirements of the National Pollutant Discharge Elimination System (NPDES) storm water regulations in accordance with 40 Code of Federal Regulations 122.26. NPDES multi-sector storm water regulations are also applicable. In general, it is the responsibility of the proponent to develop and maintain a site-specific Storm Water Pollution Prevention Plan for (SWPPP).. Implementation of the SWPPP must provide reasonable assurance that the activity with coverage under the NPDES storm water regulations will be conducted in a manner that will not violate applicable water quality standards.

Finally, SWQB may revise the criteria and guidance outlined in this memo based on sampling results, field investigation activities or additional information gathered in the process of implementing the IM.


8/27/01