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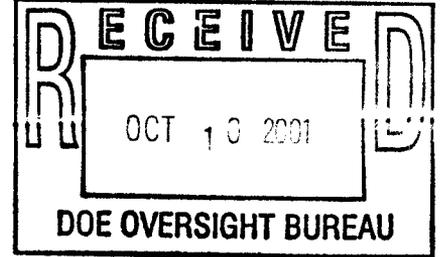
PETER MAGGIORE
SECRETARY

PAUL RITZMA
DEPUTY SECRETARY

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

October 3, 2001

Mr. Jack V. Ferguson, P.E.
NPDES Permits Branch (6WQ-P)
U. S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733



**Re: Debris Clean Up of Los Alamos National Laboratory (LANL) Airport Landfill
Drainage Debris Area [Solid Waste Management Unit 73-001(a), NPDES Storm
Water Multi-Sector General Permit NOS. NMR05A734 and NMR05A735**

Dear Mr. Ferguson:

On September 26, 2001 representatives of the New Mexico Environment Department (NMED), the Los Alamos National Laboratory (LANL) and the US Department of Energy (DOE) conducted a site visit to the LANL Airport Landfill drainage debris disposal area. This site is located on DOE property at the Los Alamos County Airport. The Airport Landfill was operated by DOE beginning in 1943 for disposal of municipal waste from the Los Alamos Townsite and laboratory. The county assumed operational control from 1965 until landfill closure in 1973. The landfill drainages that contain refuse lead from the edge of the landfill on the mesa top to the main ephemeral watercourse at the base of Pueblo Canyon. Investigations conducted to date indicate that the majority of the drainage debris originated from incidental operation of the landfill, although some of the refuse in the drainages was intentionally dumped.

The purpose of the site tour was to understand and discuss available options for dealing with the site to satisfy both State regulations and Federal storm water regulations. Issues related to removal of the refuse were discussed, as well as best management options that would achieve environmental regulatory compliance while balancing health and safety concerns of cleanup actions. The Airport Landfill is a regulated solid waste management unit [SWMU 73-001 (a,b,c,d) and 73-004(d)] listed on the LANL Facility operating permit and currently undergoing Resource Conservation and Recovery Act (RCRA) corrective action under the direction of NMED. In order to allow the cleanup to proceed, the following recommendations were formulated, and are provided to the Environmental Protection Agency (EPA) for review and



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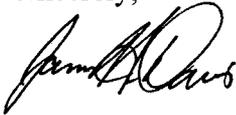
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concurrence to ensure consistency with the NPDES Storm Water Multi-Sector General Permit (MSGP). These specific steps are only applicable to this SWMU.

1. All refuse in and around the several drainage channels, which includes tires, wood debris, concrete, auto parts and other metal scrap, should be removed, except those items that are substantially buried and therefore pose no reasonable potential to move. As a practical matter, items that are less than 50% buried in sediment should be removed. Items whose removal presents a real and credible threat to worker health and safety may also remain in place.
2. Appropriate Best Management Practices should be installed where efficacious to prevent the movement of disturbed soil or other contaminants into surface water. All erosion control measures must be inspected and maintained on a regular basis to insure and assess their effectiveness.
3. At the base of the drainages containing refuse, one or more retention structures (or equivalent) should be constructed to control the potential pollutant load these sources may contribute to waters of the U.S. Such structures should be engineered to intercept all storm water runoff from the landfill drainages and allow for routine sampling.
4. If, after storm events, there is insufficient water to sample, it may be reasonably argued that no discharge from the drainages has occurred and therefore no water sampling/analysis is required. In addition, water sampling and analysis may be necessary for only one landfill drainage if it can be demonstrated that other drainage outfalls are "substantially identical" (i.e., those that show similar significant sources of pollutants and storm water discharge volumes; ref: 40 CFR 122.26 and Part 5.2.4 of the MSGP). Finally, sampling and analysis must be performed in accordance with 40 CFR 136 and the MSGP.
5. Routine inspection and maintenance of the retention structure(s) is required to ensure that they are functioning as intended.
6. To prevent significant run on, the landfill cap design for SWMU 73-001(a, b, c, d) and 73-004 (d) must include structural and/or nonstructural controls to divert storm water away from the drainages.
7. In accordance with Part 4.0 of the MSGP and 40 CFR 122.26, it is the responsibility of the permittee to develop, maintain, and implement a site-specific Storm Water Pollution Prevention Plan (SWPPP). All activities related to the landfill drainages, for example, should be documented in the site-specific SWPPP.
8. LANL will be required to comply with all other State and Federal Regulations.

Our goal is to accelerate clean up activities at the Airport Landfill and ensure that all State and Federal regulations are satisfied. Since EPA plays a key role in the decision making process for this cleanup effort, NMED believes it is essential to communicate the details of the project to EPA. If you have any questions, comments or concerns regarding the proposed drainage clean up, or wish to visit the site, please contact me at (505) 827- 0187.

Sincerely,



James H. Davis, Ph.D.
Bureau Chief

cc: Greg Lewis, Director, NMED Water and Waste Management Division
James Bearzi, Chief, NMED HWB
✓ John Parker, Chief, NMED DOE OB
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