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JAN 2 7 2012

Date:

Refer To: EP2012-0008

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

Subject: Revised Submittal of the Erosion Controls Associated with Fishladder Canyon

[Solid Waste Management Unit 16-003(o)]

Dear Mr. Kieling:

In response to the New Mexico Environment Department's (NMED's) letter dated December 28, 2011, and referenced by EP2011-5570, this revised letter documents stormwater management following mitigation activities at Solid Waste Management Unit (SWMU) 16-003(o)—"Fishladder Canyon". This letter is required as part of NMED's approval with modifications for the Phase II investigation report for the TA-16-340 Complex, revision 1, dated February 9, 2009.

Stormwater controls were installed during Phase II investigation activities in July 2008 on the mesa top and north-facing hillslope draining into Fishladder Canyon and in the main Fishladder Canyon drainage. Controls included straw wattles on the mesa top, hillslope, and access road (see attached Figures 1 to 3) designed to control surface erosion and sediment transport by establishing a permanent vegetation cover. Previously existing individual permit controls in the main channel include a rock check dam (Figures 4 and 5) and a gabion structure, which were designed to reduce flow velocities and sediment transport.

SWMU 16-003(o) is included in Los Alamos National Laboratory's National Pollutant Discharge Elimination System Stormwater Individual Permit (Permit No. NM0030759). Stormwater controls at the SWMU are inspected under the individual permit program at least once per year or following a 0.25-in./30 min or greater intensity rain event or following an exceedance of permit-specified stormwater standards. Controls managed exclusively under the individual permit are not photographed. Controls at this SWMU were inspected six times this year between July 14 and October 14:

- 1. A preventive maintenance inspection was completed on July 12, 2011, with no findings.
- 2. A rain event inspection was completed on August 5, 2011, with no findings.

- 3. Following the rain event inspection on August 21, 2011, a rock check dam was determined to have reached sediment-holding capacity, and a replacement rock check dam was installed approximately 45 ft downstream of the original location. One straw wattle was determined to be undercutting and was subsequently backfilled. Another wattle had been moved from its original location and was repositioned and restaked.
- 4. During the rain event inspection on September 1, 2011, one wattle was observed to have insufficient contact with the soil, and additional stakes were added.
- 5. Following the rain event inspection on September 15, 2011, two straw wattles were determined to be in poor condition and were replaced.
- 6. In response to recommendations made during the individual permit annual erosion inspection and evaluation completed on October 14, 2011, two additional rock check dams were installed on November 22, 2011, to reduce stormwater velocity in the main channel.

If you have any questions, please contact John McCann at (505) 665-1091 (jmccann@lanl.gov) or Woody Woodworth at (505) 665-5820 (lance.woodworth@nnsa.doe.gov).

Sincerely,

Michael J. Graham, Associate Director

**Environmental Programs** 

Los Alamos National Laboratory

Sincerely,

George J. Rael, Assistant Manager

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MG/GR/DM/JM:sm

Attachment: Figures (LA-UR-12-0089)

Cy: (w/att.)

Neil Weber, San Ildefonso Pueblo

Laurie King, EPA Region 6, Dallas, TX

Steve Yanicak, NMED-DOE-OB, MS M894

Tom Skibitski, NMED-OB, Santa Fe, NM (date-stamped letter emailed)

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