Response to the Second Disapproval for the 2012 Monitoring Plan for Los Alamos and Pueblo Canyons Sediment Transport Mitigation Project, Revision 1
Los Alamos National Laboratory, EPA ID No. NM0890010515, HWB-LANL-12-016,
Dated August 30, 2012

INTRODUCTION

Los Alamos National Laboratory (LANL or the Laboratory) submitted the 2012 Monitoring Plan for Los Alamos and Pueblo Canyons Sediment Transport Mitigation Project (LA-UR-12-1080) in March 2012. NMED's Notice of Disapproval was received by LANL on April 16, 2012. LANL's Response to the Notice of Disapproval and 2012 Monitoring Plan for Los Alamos and Pueblo Canyon Sediment Transport Mitigation Project, Revision 1 (LA-UR-12-21486) was submitted in May 2012. NMED's Disapproval of the Revision 1 Monitoring Plan was received on June 14, 2012. LANL's Response to the Notice of Disapproval was submitted July 23, 2012. NMED's Second Disapproval of the 2012 Monitoring Plan for Los Alamos and Pueblo Canyons Sediment Transport Mitigation Project, Revision 1 was received August 30, 2012. This response and Revision 2 of the Monitoring Plan are being submitted to address comments from the second disapproval.

To facilitate review of this response, the New Mexico Environment Department's (NMED's) comments are included verbatim. Los Alamos National Laboratory's (LANL's or the Laboratory's) responses follow each NMED comment.

NMED Comment

1) Response to Comment 1

In the response, the Permittees state, "LANL's program for stormwater monitoring at canyon gages, specifically in the LA/P watershed, is to retrieve samples, inspect, and repair damaged or malfunctioning equipment as quickly as possible following a discharge event (typically within 24 h, exclusive of weekends and holidays). Gage station inspections not triggered by discharge are conducted on the following schedule: E050.1, E060.1, and E109.9 weekly throughout the year; the remaining stations weekly during the monitoring period (June 1 to October 31) and monthly for the remainder of the year."

The Permittees go on to state, "[m]inor damages or malfunctioning equipment can be repaired quickly (almost always in less than 5 business days). More significant damage to a flume, stilling well, or support structure and other damages that require heavy equipment will likely require more time to repair."

NMED agrees with the Permittees' proposed approach provided in the Response. For completeness, submit a revised monitoring plan that includes the objectives and time frames as specified in the Response. The requirements for implementation shall include the following:

- *retrieval of samples within one business day of sample collection. The Permittees shall retrieve samples in the following priority order, if necessary:*
  - *Buckman early notification stations*
  - *down gradient LANL boundary stations*
  - *upgradient LANL boundary stations*
  - *balance of stations in LA/P canyons*
  - *internal LANL stations.*

- *repair of damaged or malfunctioning equipment within five business days, and*
- *inspection of gage stations and samplers a minimum of once every week during dry periods.*

In the event that the Permittees are unable to meet the requirements for sample collection or inspection and repair of any monitoring station, provide a statement in the annual monitoring report documenting the inability to meet the requirements for sample retrieval and/or maintenance and the associated dates and cause of the deviation(s).

LANL Response

1. The monitoring plan has been revised accordingly, and in the event that LANL is unable to meet the requirements put forth above and in the monitoring plan, a statement(s) will be provided in the annual monitoring report documenting the inability and cause of the deviation(s).

NMED Comment

2) Response to Comment 2

NMED concurs with the movement of intakes at both E109.9 and E038. The rationale for collecting both upstream and downstream samples at the Los Alamos low head weir from the same storm events as a basis for not moving the intake at E042.1 is acceptable.

The rationale for not moving the intake at E026 is somewhat tenuous. While in most years four storms that generate in excess of 10 cubic feet per second (cfs) do not occur, most storms that do exceed 10 cfs also exceed 15 cfs. The two samples collected at E026 over the past two years were both obtained during storms that generated flows over 30 cfs. If silting continues to be a problem for collecting samples at E026 during the 2012 storm water sampling season, re-evaluate moving the intake for the 2013 sampling season.

LANL Response

2. The Buckman Direct Diversion Board would like a formal document requesting an adjustment to the intake height at E109.9, which the U.S. Department of Energy and LANL are currently preparing. LANL will continue to reevaluate moving the intake at E026 if silting continues.