

**Response to the Notice of Disapproval for the 2013 Monitoring Plan for
Los Alamos and Pueblo Canyons Sediment Transport Mitigation Project,
Los Alamos National Laboratory, EPA ID No. NM0890010515, HWB-LANL-13-016,
Dated June 7, 2013**

INTRODUCTION

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. *In Section 3.0, the Permittees state “[l]arge parts of the upper watersheds of Los Alamos Canyon and a major tributary, Guaje Canyon, were affected by the Las Conchas fire in 2011. As documented after the Cerro Grande fire (Gallaher and Koch 2004, 088747), storm water chemistry can be strongly affected by incorporation of ash from burn areas. To help evaluate the influence of the Las Conchas fire on storm water quality in 2011, americium-241 and cyanide were added to the analytical suites at E026 and E030, and cyanide was added to the analytical suites at the other Los Alamos Canyon gages (E042.1, E050.1, and E109.9). Additionally, SSC measurements across the hydrograph were repeated at the upper boundary station at E026 to better characterize sediment flux from the burn area upstream from Laboratory sites. These modifications to the monitoring plan will continue in 2013.”*

The Permittees' statement that the modifications to the monitoring at E030 will continue in 2013 is not supported by the deletion of E030 from the monitoring plan with no indication nor justification. PCB levels at E030 have dropped significantly since the Las Conchas fire and must continue to be monitored for evaluation of the fire's influence on storm water quality. The Permittees must reincorporate monitoring location E030 into the Plan.

LANL Response

1. LANL has modified the 2013 plan to include location E030 and will continue to monitor for constituents, as presented in Table 3.2-3 of the revised 2013 monitoring plan, including americium-241 and cyanide

NMED Comment

2. *In addition, the Permittees removed monitoring location E040 from the Plan with no indication nor justification in the narrative. The Permittees must reincorporate monitoring location E040 into the Plan or provide sufficient justification [for] its removal.*

LANL Response

2. LANL has modified the 2013 plan to include E040 and will monitor for constituents, as presented in Table 3.2-3 of the revised 2013 monitoring plan.

Additional Revisions

Additional corrections were made in the text including the following: (1) location CO115002 was inadvertently left in the bulleted list for DP Canyon and has been removed (p. 4, paragraph 2); and (2) the sampling sequence times for locations E042.1 and E059 in Table 3.2-5 have been corrected (p. 15). Minor editorial changes were made in the plan for the sake of correctness and clarity.