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EP2012-5085

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 16, 2012

Pete Maggiore
Environmental Operations Manager
Los Alamos Site Office
Department of Energy
3747 West Jemez Road, MS A316
Los Alamos, NM 87544

Michael Graham
Associate Director Environmental Programs
Los Alamos National Security, L.L.C.
P.O. Box 1663, MS 991
Los Alamos, NM 87545

RE: APPROVAL
STORMWATER PERFORMANCE MONITORING IN THE LOS ALAMOS/PUEBLO WATERSHED DURING 2011
LOS ALAMOS NATIONAL LABORATORY (LANL)
EPA ID #NM0890010515
HWB-LANL-12-010

Dear Messrs. Rael and Graham:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) and the Los Alamos National Security L.L.C.'s (LANS) (collectively, the Permittees) *Stormwater Performance Monitoring in the Los Alamos/Pueblo Watershed During 2011* (Report), dated February 2012 and referenced by LA-UR-12-0606/EP2012-0029. NMED has reviewed the Report and hereby issues this Approval with Modifications.

GENERAL COMMENTS:

1) Correlations of flow to SSC and SSC to specific contaminants are provided on a watershed basis in Figures 4.4-1, 4.4-2, and 4.4-3. Most of these comparisons do not show strong correlations. These correlations are more appropriately made on a station by station basis. For all future Stormwater Performance Monitoring Reports (SPMRs), the Permittees must provide these correlations on a station by station basis.

2) Figure 3.2-4 depicts the time location of the SSC sample collection on the hydrographs for individual sampling events. Marking times of the sample collection on the hydrograph for both SSC and chemical analysis samples is important for interpretation of the data. For all future SPMRs, the Permittees must also include the time locations for collection of the samples for chemical analyses on the hydrographs for individual sampling events.

3) For all future SPMRs, the Permittees must include comparisons of total discharge and mass transport both between stations and from year to year since 2010 at individual stations.

4) In a response to this Approval with Modifications, provide an evaluation of the success of the sampling strategy implemented in 2011. Specifically, the Permittees must evaluate the effectiveness of the programming that initiated sample collection based on a discharge value that is less than the previous two discharge values. Explain how this strategy compares to a program utilizing a time delay following a specific discharge value.

SPECIFIC COMMENTS:

5) **Section 2.1, Sampling at the Detention Basins below the SWMU 01-001(f) Drainage and in Graduation Canyon, page 4**

Permittees' Statements: "In 2011, an automated sampler was used to collect samples from station CO115002 in Graduation Canyon above the confluence with Pueblo Canyon on October 7 and 8 and on October 27. The sampling location is shown in Figure 1.0-1."

NMED comment: There is no sample location icon on Figure 1.0-1 for station CO115002. Correct this in all future SPMRs. Also, in the response to this Approval with Modifications, provide an explanation why this location was not sampled until October, when there was very little precipitation or flow in any of the canyons. It appears that sampling at this location was inadvertently omitted based on the sampling dates and the limited discussion in the Report.

6) **Section 4.1, Data Exceptions, page 19, 2nd paragraph**

Permittees' Statement: When the SSC was over 5000 mg/L and analytical techniques were not adjusted appropriately to compensate for the increased solid component, americium-241, isotopic plutonium, and isotopic uranium activities were underreported.

NMED comment: Adjust all future elevated SSC results properly to prevent underreporting.

7) **Table 4.2-2 Maximum Detected Results By Station and Event above Comparison Values in LA/P Stormwater Samples in 2011, pages 160 and 161**

NMED comment: Review the listed 2,3,7,8-TCDD TEQ. Six TEQs differed with those shown on Table 4.2-2.

8) **Data Disc, LA-P 2011 Stormwater data.xlsx and LA-P 2011 Sediment data.xlsx**

NMED Comment: Include a column in these two spreadsheets specifying the Station ID for the samples. The Permittees must provide a revised version of the tables to NMED in the response with the Station ID columns included.

The Permittees must provide the required response to this Approval with Modifications by **April 30, 2012.** Please contact Ben Wear at (505) 476-6041 should you have any questions.

Sincerely,

John E. Kieling
Acting Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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File: LANL '12, Los Alamos/Pueblo Canyons