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NOV 2016

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

Subject: Inspection and Maintenance of Erosion Controls in Drainages to the 90s Line Pond

at Technical Area 16

Dear Mr. Kieling:

This letter documents the annual inspection of erosion controls measures associated with the drainages entering the 90s Line Pond, Consolidated Unit 16-008(a)-99. This letter is required as part of the New Mexico Environment Department's (NMED's) Approval with Modifications (for the) Supplemental Investigation Work Plan for Consolidated Units 16-007(a)-99 and 16-008(a)-99 at Technical Area 16, dated December 31, 2008, in which NMED states, "The Permittees must continue to conduct annual inspections and submit the proof of maintenance of erosion controls in the drainages to 90s Line Pond every year by November 30th."

The individual solid waste management units within Consolidated Unit 16-008(a)-99 are located within a level, well-vegetated area mesa top in Technical Area 16. Surface flows generated in the area discharge to the 90s Line Pond through two narrow drainage channels and have little potential to reach any waters of the U.S. The 90s Line Pond was remediated in 2009 and has no outlet.

Best management practices (BMPs), installed in 2008 in the drainages to the 90s Line Pond, consist of five juniper bale controls designed to block sediment transport down the drainages into the pond. Controls were inspected on September 1, 2016, and the results indicate all controls are currently in good operating condition (Figures 1 to 7), with no evidence of erosion in the drainages.

Since the first inspection in 2009 to the inspection conducted in 2016, no evidence of erosion has been documented for 90s Line Pond drainages, including after a 3.52-in. rain event on September 13, 2013. Given the well-documented stability of the drainages and controls, Los Alamos National Security, LLC, requests that hereafter inspection reports be submitted biannually and no later than December 31 to allow inspections to be conducted after significant late season storm events.

If you have any questions, please contact Steve Veenis at (505) 667-0013 (veenis@lanl.gov) or David Rhodes at (505) 665-5325 (david.rhodes@em.doe.gov).

Sincerely,

Bruce Robinson, Program Director Environmental Remediation Program Los Alamos National Laboratory Sincerely,

David S. Rhodes, Director

Office of Quality and Regulatory Compliance

S.Ch.

Environmental Management Los Alamos Field Office

BR/DR/SP:sm

Attachment: Two hard copies with electronic files –Figures for the Inspection and

Maintenance of Erosion Controls in Drainages to the 90s Line Pond at

Technical Area 16 (EP2016-0145)

Cy: (w/electronic att.)

Laurie King, EPA Region 6, Dallas, TX

Raymond Martinez, San Ildefonso Pueblo

Dino Chavarria, Santa Clara Pueblo

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David Rhodes, DOE-EM-LA

Jeff Walterscheid, ADEM ER Program

Steve Veenis, ADEM ER Program

Public Reading Room (EPRR)

PRS Database

ADESH Records

Cy: (w/o enc./date-stamped letter emailed)

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Michael Brandt, ADESH

William Mairson, PADOPS

Craig Leasure, PADOPS



Figure 1 Vegetated Consolidated Unit 16-008(a)-99 draining to 90s Line Pond, September 2016.



Figure 2 Run-on control earthen berm in the vegetated area draining to 90s Line Pond, September 2016.



Figure 3 Juniper bale check dams located in drainage channel to 90s Line Pond, September 2016. Note needle cast and vegetation in channel.



Figure 4 Juniper bale check dam located in drainage channel to 90s Line Pond, September 2016. Note vegetation in channel.



Figure 5 Juniper bale check dam located in drainage channel to 90s Line Pond, September 2016. Note vegetation in channel.



Figure 6 Juniper bale check dam located in drainage channel to 90s Line Pond, September 2016. Note vegetation in channel.



Figure 7 90s Line Pond, September 2016