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ENVIRONMENT DEPARTMENT
Hazardous Waste Bureau



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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

July 20, 2017

Doug Hintze, Manager
 U.S. Department of Energy
 Environmental Management
 P.O. Box 1663, MS M984
 1900 Diamond Drive
 Los Alamos, NM 87544

**RE: 2016 ANNUAL LONG-TERM MONITORING STATUS REPORT
 LOS ALAMOS COUNTY AIRPORT LANDFILL COVER
 REPLACEMENT SOLID WASTE MANAGEMENT UNITS 73-001(a, d)
 TECHNICAL AREA 73
 LOS ALAMOS NATIONAL LABORATORY
 EPA ID #NM0890010515
 HWB-LANL-17-028**

Dear Mr. Hintze:

The New Mexico Environment Department (NMED) has received the United States Department of Energy's (DOE) (the Permittee's) *2016 Annual Long-Term Monitoring Status Report Los Alamos County Airport Landfill Cover System Replacement Solid Waste Management Units 73-001 (a, d) Technical Area 73*, (Status Report) dated March 2017; and received May 12, 2017.

NMED has reviewed the Status Report and provides the following comments which should be incorporated into the Annual Report due February 14, 2018.

U1701048

Comments:

1. Title of Document, page 1

NMED Comment: NMED notes that the Status Report includes only two quarters of data, and that the 2016 inspections are referred to as year 1, quarter 3 and 4 inspections. NMED would like to clarify that at least four quarters of data are required per monitoring year, as specified in the March 2017 Long-Term Monitoring Plan (LTMP) (*see* Table 1: Monitoring Elements/Frequency of Covers Systems). For the total number of quarters for which monitoring is required, please refer to Table I of the LTMP.

2. Table of Contents, page 4

- a. **NMED Comment:** The Status Report is missing some Sections and Attachments. A template is provided below, which incorporates the appropriate sections and subsections:

Table of Contents

1.0 INTRODUCTION

1.1 Background

1.2 Purpose

2.0 SCOPE OF ACTIVITIES

2.1 ET Cover and Debris Disposal Area (DDA) Monitoring

3.0 SUMMARY OF PERFORMANCE MONITORING RESULTS

3.1 ET Cover

3.1.1 *Water Balance Monitoring*

3.1.2 *Methane Monitoring*

3.1.3 *Biointrusion Monitoring*

3.2 Storm Water Control Systems

3.3 Fencing

3.4 Retaining Walls

3.5 Erosion and Sediment Control

3.6 Site Access

3.7 DDA Cover System

4.0 CONCLUSIONS AND RECOMMENDATIONS

5.0 REFERENCES

- b. **NMED Comment:** The Table of Contents should be modified to list the attachments that should be included with the submittal as shown below:

ATTACHMENTS

A. Inspection Check Lists

B. Photographs

C. Water Table Monitoring Data

D. Methane Monitoring Data

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E. Monitoring After Significant Rainfall Events

3. Figure 2 Instrumentation Locations, page 8

NMED Comment: Monitoring location labels appear to have been offset from the monitoring locations. Monitoring location labels should be corrected to indicate appropriate locations. For instance, the label for Methane-4 appears to be several hundred feet northwest of the actual monitoring location.

4. Conclusions and Recommendations, page 9

NMED Comment: The Status Report does not have a conclusions section. The conclusion section should discuss the performance of the landfill cover system during the monitoring period and should also describe any repairs or changes to the unit, if conducted; as well as any recommendations for the forthcoming monitoring year.

5. Inspection Checklist Remarks, Attachment A

- a. **NMED Comment:** The Status Report must include the approximate vegetation height at the time of the inspection (*e.g.*, vegetation was ~6 inches tall). Site observations should be included in Section 3.1 as specified in the template shown in comment 2 above, as well as recorded in attachment checklists (*see* the mowing specifications as described in Section 4.1.3, Biointrusion Monitoring, of the LTMP).
- b. **NMED Comment:** The Status Report does not indicate how settling of the landfill cover will be monitored. The Permittee must provide a description of how settling will be measured in the forthcoming monitoring year.

6. Methane Monitoring, Attachment D

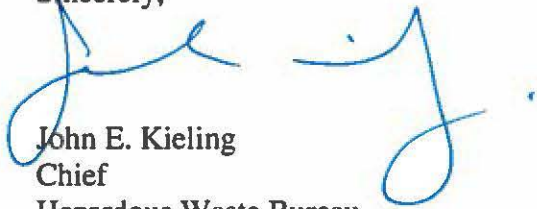
NMED Comment: The Status Report must provide copies of field notes or printouts of gas monitoring data in an Appendix to verify the results listed in Table 2, Methane Monitoring Readings.

In accordance with the approved LTMP, the DOE is required to submit monitoring reports for the Los Alamos County Airport Landfill Replacement Cover System that describes the monitoring and inspection result from the previous calendar year. The first annual report documenting the monitoring and inspection results of two quarters of 2016 and four quarters of 2017 must be submitted no later than **February 14, 2018** and annually by February 14th thereafter in accordance with the schedule specified in the LTMP.

Mr. Hintze
July 20, 2017
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Please contact Siona Briley of my staff at (505) 476-6049 should you have any questions.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc:

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File: 2017 Reading, 2016 Annual Long Term Monitoring Status Report (2 quarters) for
TA-73-001(a) Los Alamos County Airport Landfill
LANL-17-028

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