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NEW MEXICO ENVIRONMENT DEPARTMENT

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Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 3, 2019

Doug Hintze, Manager Environmental Management U.S. Department of Energy Los Alamos Field Office P.O. Box 1663 MS M984 Los Alamos, NM 87545

RE: APPROVAL

2018 SANDIA WETLAND PERFORMANCE REPORT

LOS ALAMOS NATIONAL LABORATORY

EPA ID #NM0890010515 HWB-LANL-19-013

Dear Mr. Hintze:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE), 2018 Sandia Wetland Performance Report (2018 Report), dated and received April 25, 2019, and referenced by EM2019-0091. This document satisfies milestone #5 of Appendix B, Milestones and Targets, of the 2016 Consent Order, for fiscal year 2019.

The DOE has met its obligation to monitor the performance of the Sandia Canyon Wetland grade control structure (GCS) for 2018. The DOE reports that the GCS appears to have decreased suspended sediment, polychlorinated biphenyls (PCBs), and chromium due to improved wetland conditions.

NMED hereby approves of the 2018 Report, with the following comments:

Comments:

1. Section 3.6 Performance of GCS, page 14

As stated by the DOE, damage was observed by NMED during the post-monsoonal walk down to the log check dam installed in 2017 Figure E 3.9-1. The DOE must assess the damage to the log check dam and provide documentation of repair work in the 2019 Sandia Wetlands Performance Report, due to NMED in 2020.

2. Table 1.4-4 ISCO Bottle Configurations and Analytical Suites 2018 Storm Water Sampling Plan for E121, E122, and E123, page 27

NMED notes that the start time to collect the samples is 10 minutes after the peak discharge height is reached in the field stormwater samplers (denoted as MAX +10). NMED is concerned that this delay in collection may result in the collection of samples that are not representative. The DOE must provide justification of this sample collection method to ensure that the samples collected are representative.

NMED has reviewed the Sections 3.8 *Proposed Changes to Monitoring from Plan from 2018* and approves of the reduction in alluvial well monitoring locations, the proposed sampling suite, and the use of aerial based geomorphological and vegetative monitoring every third year or after a large disturbance event (100 cubic feet per second). The DOE must continue to monitor the performance of the Sandia Canyon Wetland GCS, and water levels in the wetlands, especially with the planned reduction in the effluent discharge from the Sanitary Effluent Reclamation Facility (SERF).

The next annual performance report must be submitted to NMED no later than April 30, 2020.

Should you have any questions or comments, please contact Siona Briley at (505) 476-6049.

Sincerely,

John E. Kieling

Chief

Hazardous Waste Bureau

cc:

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File: 20

2019 LANL, Approval 2018 Sandia Wetland Performance Report, TA-03

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