



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544



MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

June 12, 1998

Mr. Theodore Taylor, Area Manager
Los Alamos Area Office-Department of Energy
528 35th Street
Los Alamos, New Mexico 87544

Dr. John Browne, Director
Los Alamos National Laboratory
P.O. Box 1663, MS-A100
Los Alamos, NM 87545

RE: Comments Concerning the Submitted Data for the Request for Environmental Restoration Ground Water and Surface Water Analytical Results

Dear Mr. Taylor and Dr. Browne:

This letter is in response to the Los Alamos National Laboratory (LANL) submittal of data per the letter from the New Mexico Environment Department (NMED) RCRA Permits Management Program's (RPMP) Request for Environmental Restoration Ground Water and Surface Water Analytical Results dated April 11, 1997. The data package was submitted to NMED in a package dated July 31, 1997 (EM/ER:97-294).

RPMP staff have reviewed Department of Energy-Oversight Bureau (DOE-OB) comments concerning the data submittal and generally concur with the DOE-OB comments presented in an April 20, 1998 letter concerning "Ground- and surface-water data provided by Los Alamos National Laboratory Environmental Restoration Project, in support of LANL's Hydrogeological Workplan". RPMP expresses concern over the lack of detail supplied with the data package. For example, it was not indicated whether many of the water samples were filtered or not. It is of great importance to know whether a water sample is filtered or not as it determines which regulatory standard to compare. When not indicated, it brings to question the usefulness of the Facility for Information Management, Analysis, and Display (FIMAD), the quality of data in FIMAD, the usefulness of the data in general, LANL's sampling procedures, etc.. RPMP is requiring the data be resubmitted following a modified format similar to the 1996 Environmental Surveillance and Compliance report (LA-13343-ENV, pages 137, 145, 148 and 190) table format or the format suggested by the DOE-OB. The following comments shall be addressed in the improved format:

- The data are not necessarily presented in any meaningful order such as well identification (common names), TA, canyon, storm water, surface water or ground water sample, etc..
- Many sample numbers/identification are not associated with a location. LANL shall provide a more recognizable description such as LADP-3, or Gaging Station 1 instead of 0316-96-3000, 04LA-96-0199, or AAB0105.



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- Provide a column for date of sample collection.
- As previously mentioned it is uncertain if some samples are filtered or not filtered. Provide a column indicating whether the sample was filtered or not filtered (if filtered, indicate the filter size). If it is not known whether a sample has been filtered or not, the sample can not be compared to any regulatory standard and shall be indicated as such or removed from the data base and not used.
- Provide a column for the sampling technique as it is not identified for most samples on the spreadsheets (e.g., bailer, bladder pump, etc.).
- Provide a column for the analytical method as it was not indicated. For example, Method 6020, ICP-MS.
- The sample digestion technique should also be added. For example, Method 3005A (dissolved metals) or Method 3010A (total metals).
- The standard deviations for the analyses shall also be included in a spreadsheet.
- Provide a column for the detection limit for the particular analyses instead of "ND" (non-detect).
- Provide a column for turbidity (NTU).
- Provide sample location map(s).

In addition, please provide a brief explanation for the determination of detects and non-detects. RPMP recommends that all data be entered into FIMAD within a month of validation (perhaps during validation?) as the data would be accessible and useful to other groups (i.e., mesa top RFI data useful when developing Canyons Work Plans). Having all the necessary information and data input into FIMAD should make the development of various work plans much more efficient and complete. Finally, RPMP recommends that LANL develop a similar data base for other media as well (e.g., soil, sediment, sludge).

The reorganization of the FIMAD format should be accomplished with coordination with ESH-18 to fit the needs of the Environmental Surveillance and Compliance data. In addition, the development of the improved FIMAD format should also be followed for the data/report submittal regarding LANLs inventory/historic compilation of all spring, surface water and ground water data as part of the implementation of the Hydrogeologic Workplan. The requested Environmental Restoration data in addition to the inventory of all springs, surface and ground water shall be submitted to RPMP within ninety (90) days of receipt of this letter. Should you have any questions concerning this letter or other related issues please contact myself or Mr. John Kieling, RPMP's LANL Facility Manager, at (505) 827-1558.

Sincerely,


Robert S. (Stu) Dinwiddie, Ph. D., Manager
RCRA Permits Management Program
Hazardous and Radioactive Materials Bureau

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cc: J. Canepa, LANL ER, MS-M992
B. Garcia, NMED HRMB
M. Johansen, DOE LAAO, MS-A316
J. Kieling, NMED HRMB
S. Kruse, NMED HRMB
M. Leavitt, NMED GWQB
H. LeDoux, DOE LAAO, MS A316
D. McInroy, LANL EM/ER, MS-M992
D. Neleigh, EPA, 6PD-N
J. Parker, NMED DOE-OB
J. Davis, NMED SWQB
S. Yanicak, NMED DOE-OB, MS-J993
File: LANL HSWA G/M/S 98
Track: LANL, doc. date, n/a, DOE/LANL, HRMB/Dinwiddie, RE, file