

Los Alamos

NATIONAL LABORATORY

Los Alamos National Laboratory
Los Alamos, New Mexico 87545

Date: April 2, 2002

In Reply Refer To: ESH-18/WQ&H-02-129

Mail Stop: K497

Telephone: (505) 667-7969

General - Groundwater

ERG

Attn: Meetings

110 Hartwell Ave.

Lexington, MA 02421

**SUBJECT: LOS ALAMOS NATIONAL LABORATORY AND LOS ALAMOS COUNTY
COMMENTS ON PERCHLORATE RULEMAKING**

Attached are Los Alamos National Laboratory and Los Alamos County comments regarding the rulemaking for perchlorate currently in progress:

1. A perchlorate in drinking water standard of 4 ppb or less cannot be supported by the current analytical method, ion chromatography.
2. Laboratory data indicate that perchlorate cannot be accurately measured at the Method Detection Limit of 1 ppb in natural waters.
3. Laboratory data indicate significant inconsistencies in the results reported by two independent, EPA-approved laboratories analyzing duplicate samples.
4. Laboratory data suggest that below 4 ppb, false positive and false negative results are possible in approximately 25% to 40% of the results.

We appreciate the opportunity to provide comments on this rulemaking effort. If you have any questions regarding the enclosed comments, please contact Bob Beers at (505) 667-7969 or Pete Padilla at (505) 662-8472.

Sincerely,



Bob Beers
Water Quality and Hydrology Group
Los Alamos National Laboratory

Sincerely,



Pete Padilla
Utilities Department
County of Los Alamos

CN/am

Attachments: a/s



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April 2, 2002

- Cy:
- C. Ortega, Los Alamos County, Los Alamos, New Mexico, w/att.
 - T. Glasco, Los Alamos County, Los Alamos, New Mexico, w/att.
 - B. Ramsey, FWO-DO, w/att., MS K492
 - K. Hargis, E-DO, w/att., MS J591
 - D. Stavert, ESH-DO, w/att., MS K491
 - S. Rae, ESH-18, w/att., MS K497
 - D. Rogers, ESH-18, w/att., MS K497
 - WQ&H File, w/att., MS K497
 - IM-5, w/att., MS A150