

General

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

June 16, 2006

Mat Johansen
Groundwater Project Manager
Los Alamos Site Office, Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, NM 87544

Andrew Phelps
Associate Director
Los Alamos National Security, LLC
P.O. Box 1663, Mail Stop J591
Los Alamos, NM 87545

**RE: NOTICE OF APPROVAL FOR THE INTERIM FACILITY-WIDE
GROUNDWATER MONITORING PLAN, REVISION 1
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-05-007**

Dear Messrs. Johansen and Phelps:

The New Mexico Environment Department (NMED) is in receipt of the United States Department of Energy and Regents of the University of California (collectively, the Permittees) document entitled *Interim Facility-Wide Groundwater Monitoring Plan, Revision 1* (hereafter, Revised Monitoring Plan) dated April 2006 and referenced by LA-UR-06-2888/ER2006-0195. NMED has reviewed the Revised Monitoring Plan and the response to NMED's December 27, 2005 Notice of Disapproval, and hereby approves the Revised Monitoring Plan with the modifications outlined below.

1. The Permittees must submit a quality assurance project plan (QAPP) for the monitoring activities proposed in the Revised Monitoring Plan. The QAPP may be submitted as an appendix to the Revised Monitoring Plan, and shall specify procedures for review of future field and laboratory Quality Assurance/Quality Control (QA/QC) results for acceptability with respect to the data quality objective. The data validation process shall include evaluating the QA/QC results against established criteria. A procedure shall be developed to implement appropriate corrective actions when the data quality cannot satisfy the established QA/QC criteria. To avoid unnecessary repetition, relevant quality management plans can be referred for details, when applicable.



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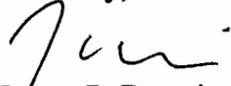
2. Monitoring tritium in wells MCOBT-4.4, MCOI-4, -5, -6, -8, R-15, -16, -33 listed in Table 4.3-1 and wells PCAO-8, 03-MW-1,-2,-3, R-19,-23i listed in Table 5.3-1 shall be performed using a low-level analytical method if tritium is detected at low levels. The practical quantitation limit for tritium using the EPA method (listed in Table C-4) is 200 pCi/L, which is much higher than the background tritium levels documented for alluvial (45-50 pCi/L), intermediate (20-26 pCi/L) and regional (0.5-2.6 pCi/L) groundwater. Tritium is a useful indicator for identification of possible releases to groundwater across from facility operations.
3. Ambiguities and errors have also been identified in the document as follows, and shall be clarified or corrected.
 - a) P.6-2, line 9. Correct the omission: Figures E.5.1 through E.5.9 are missing
 - b) Table C-2 (pages C-3 and C-4). Provide clarification for the following statement: "Samples are collected directly from the pump discharge line as soon as practical after purging is complete, but later than eight hours." Also, include rationale why samples need to be collected eight hours later or correct if the statement is inaccurate.
 - c) Table C-2 (page C-5). Provide clarification for the following statement "For spring sampling sites may be identified is similar to surface water locations."
 - d) Table D-3. Provide units for the columns titled *Purging Rates*, *Depth To Pump/Port*, *Screen Location Top*, and *Screen Location Bottom*.
 - e) Figure E6.3. Provide clarification. The period (from 1998 to 2002) for the data points in the figure is not consistent with that (from 1998 through 2005) stated in the figure title.
 - f) Ancho Spring is proposed for semiannual monitoring in Table 7.3-1, but proposed for annual monitoring in Table 8.3-1. NMED requires Ancho Spring to be monitored on a semiannual basis. Correct the tables as appropriate.

The Permittees are required to submit the QAPP within 30 days of receipt of this letter. In addition, all changes to the tables and any required clarifications must be submitted concurrently for NMED's record. The Permittees are required to submit two hard copies of the QAPP and the modified tables and pages, as well as one electronic (searchable PDF) copy of the updated document at the same time. If the Permittees fail to implement the modifications or provide additional information, the approval for this document will be automatically rescinded.

NMED is expected to receive the first monitoring report within 120 days after completion of the first-round Mortandad watershed monitoring fieldwork. Should you have any questions or comments, please contact Hai Shen of my staff at (505) 428-2539.

Messrs. Johansen and Phelps
Notice of Approval for the IFGMP Rev 1
June 16, 2006
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Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau
JPB:hs

cc: D. Cobrain, NMED HWB
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file: Reading and LANL General (Groundwater, IFGMP)