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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 4, 2010

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Los Alamos Site Office, Department of Energy
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Michael J. Graham
Associate Director Environmental Programs
Los Alamos National Security, LLC
P.O. Box 1663, MS M991
Los Alamos, NM 87545

**RE: APPROVAL WITH DIRECTION
2009 INTERIM FACILITY-WIDE GROUNDWATER MONITORING PLAN
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-09-021**

Dear Messrs. Rael and Graham:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) and the Los Alamos National Security, L.L.C.'s (LANS) (collectively, the Permittees) document entitled *2009 Interim Facility-Wide Groundwater Monitoring Plan* (Plan) dated May 2009 and referenced by EP2009-0143. NMED hereby approves the 2009 Plan, and provides the following comments and direction.

Annual updates to the Plan fulfill a requirement of the March 1, 2005 Compliance Order on Consent (Order) to indicate proposed locations and frequency of groundwater sampling, the proposed parameters for analysis, and the proposed methods for sampling and analysis of existing groundwater monitoring wells. The groundwater data collected under the Plan is used for subsurface characterization, groundwater monitoring network evaluation, and to support corrective measures. The updates reflect ongoing changes to the groundwater monitoring network. The Plan will eventually be superseded by a long-term monitoring plan or plans.



Since submittal of the 2009 Plan, the groundwater monitoring network at the Los Alamos National Laboratory (LANL) has experienced substantial change through the replacement or rehabilitation of older (and sometimes defective) wells, and installation of new wells. NMED expects further augmentation over the next few years. The recent changes will be included in the 2010 Plan. Each update, including the 2010 Plan, must compliment development of a robust groundwater monitoring well network across the Facility through continuing transition from strictly watershed-based groundwater monitoring to monitoring based on cross-watershed areas of interest. For example, the 2009 Plan acknowledged the need for a “stand-alone” monitoring well network at TA-54 to provide effective groundwater monitoring.

NMED will provide more detailed comments to the 2010 Plan. In the interim, the Permittees must ensure that the following issues are addressed in the 2010 Plan:

- 1) Table C-4.0 (Analytical Methods – Groundwater Analytical Suites) must be updated with information on applicable background and/or screening levels for each analyte listed in the table. Each analyte with a target PQL (practical quantitation limit) above the applicable background and/or screening level must be highlighted in the table, and the Permittees must provide an explanation for each such occurrence.
- 2) For each sampling location, a list of analytes (or groups of analytes) excluded from analytical suites must be provided. The Permittees must provide the reason for each exclusion.
- 3) For all screening standards based on hardness, a site-specific or watershed-specific hardness must be used, if available. The Permittees must provide justification for using hardness values that are not site-specific or watershed-specific.

No revision of the 2009 Plan is necessary.

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Should you have any questions, please contact Jerzy Kulis of my staff at (505) 476-6039.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

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