



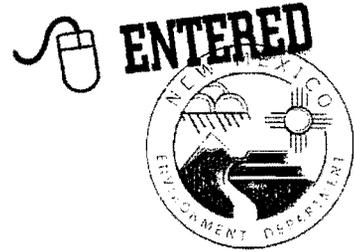
BILL RICHARDSON
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T A O O
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ENVIRONMENT DEPARTMENT

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 8, 2010

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Michael J. Graham
Associate Director Environmental Programs
Los Alamos National Security, LLC
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Los Alamos, NM 87545

**RE: REVIEW OF THE PERIODIC MONITORING REPORT FOR
LOS ALAMOS WATERSHED, JULY 7-JULY 23, 2009
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-09-078**

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 LLC's (LANS) (collectively, the Permittees) *Periodic Monitoring Report for Los Alamos Watershed, July 7-July 23, 2009* (PMR), dated November, 2009 and referenced by LA-UR-09-7415/EP2009-0613. NMED has reviewed the PMR and provides following comments.

Table 2.0-1 of the semi-annual PMR states that DP Spring was not scheduled for monitoring this round. DP Spring is scheduled for monitoring once a year according to Table 2.4-1 of the 2008 Interim Facility-Wide Groundwater Monitoring Plan. DP Spring was not sampled during the last sampling round. However, the review of the analytical results provided in Appendix C indicates that DP Spring was sampled during this round as scheduled.



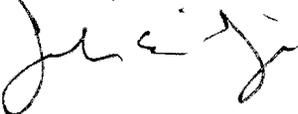
The Permittees did not include alluvial well LAO-6 in the Table 2.0-1 and did not provide any explanation for excluding it in Table 3.4-1 (Los Alamos PME Analytical Chemical Deviations). Additionally, in Appendix A where field parameter results are reported (Page A-9) a temperature reading of 606 degrees centigrade is reported for LAO-1 which is a typographical error.

Table 3.4-2 lists various chemicals for which practical quantitation limits (PQLs) and method detection limits (MDLs) exceeded screening-level values. The Permittees did not provide associated sample numbers and locations in the table. It is not clear from the table if the reported exceedances for the listed chemicals are for one sample, a few samples, or all samples in the data set. The manner in which data are presented in the table makes it difficult to determine the overall impact of these exceedances on the entire data set. In the future, the Permittees must present the data in a manner that clearly indicate the impact of such deviations. As required by the Section IX.C.3.c of the Consent Order, the Permittees must select appropriate analytical method so that PQLs and MDLs do not exceed background levels, cleanup standards, or screening levels.

Several chemicals were detected at concentrations that exceeded standards. For example, polychlorinated biphenyls (PCBs) were measured by the congener method for the first time and the analytical results indicate that several PCBs exceeded applicable standards. Polycyclic aromatic hydrocarbons were detected for the first time and exceeded the applicable cleanup standards in intermediate well R-6i. Detected concentrations of arsenic also exceeded the cleanup standard at APCO-1. NMED will use data from the next sampling round to assess trends for contaminants that exceeded the cleanup standards.

Please contact Neelam Dhawan at (505) 476-6042, should you have any questions.

Sincerely,



John E. Kieling
Program Manager
Permits Management Program
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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File: Los Alamos Watershed (Jul 7-23, 2009), PMR 2010