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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 29, 2010

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**RE: REVIEW OF THE PERIODIC MONITORING REPORT FOR WHITE
ROCK WATERSHED, SEPTEMBER 22 – OCTOBER 1, 2009
LOS ALAMOS NATIONAL LABORATORY EPA ID No. 0890010515
HWB-LANL-10-019**

Dear Messrs. Rael and Graham:

The New Mexico Environment Department (NMED) has received the United States Department of Energy and the Los Alamos National Security, LLC (collectively, the Permittees) *Periodic Monitoring Report for White Rock Watershed, September 22 – October 1, 2009* (PMR), dated March 2010 and referenced by LA-UR-10-0938/EP20910-0074. The NMED conducted a review of the PMR and provides the following comments.

Comment 1. Number of Springs and Surface Water Locations Sampled

In the second paragraph of the Executive Summary, the Permittee states that four surface water monitoring stations and twenty-two springs were sampled. The last sentence of the first paragraph in Section 1.0 states that nineteen springs were sampled. The first sentence in Section 5.2.1 states that two surface water locations were sampled. Data in Table C-2, Analytical Results, indicates that twenty-three springs and three surface water locations were sampled. There are discrepancies between the data and the text. The Permittees must resolve these discrepancies in the next PMR.



Comment 2. Depiction of Sampling Locations

Figure 2.0-1, Watershed Sampling Locations, does not depict all of the locations that were sampled. La Mesita Spring, Ancho Spring, Sacred Spring, Sandia Spring and Firjoles at Rio Grande are not shown in Figure 2.0-1. However, the four springs are shown in Figure 4.2-1 (Watershed unfiltered dibenz(a,h)anthracene concentrations in $\mu\text{g/L}$). In addition, locations of Buckman Diversion SW and Rio Grande at Otowi (sampling locations listed in Table 8.4-1 White Rock Canyon and Rio Grande Watershed Interim Monitoring Plan (EP2009-0143)) are not depicted in Figure 2.0-1. The Permittees must depict all sampling locations in future Periodic Monitoring Reports.

Comment 3. Analytical Data Not Reported

Table 2.0-1, Monitoring Locations and General Information, indicates that Sandia Spring, Spring 1 and Spring 2 were sampled, but the analytical results are not included in the PMR. Further, a figure on page E-1 depicts an elevated level of unfiltered arsenic. Analytical data for these three springs which were sampled in September/October 2009, must be included in the next Periodic Monitoring Report.

Comment 4. Analytical Data for Spring Not Sampled

Table 3.4-1, Observations and Deviations, indicates that Spring 5B was not sampled because the spring was mixing with the river. However, analytical data for Spring 5B dated 9/29/09 are included in Table C-2, Analytical Results. The Permittees must resolved these discrepancies in the next PMR.

Comment 5. Practical Quantitation Limits Above Screening Levels

NMED noted that two chemicals were detected at concentrations that exceed standards. Dibenz(a,h)anthracene was detected in two samples at levels above the EPA tap water screening level ($0.29 \mu\text{g/L}$); in a field blank for Sacred Spring at $2.09 \mu\text{g/L}$ and in the groundwater sampled at La Mesita Spring at $1.63 \mu\text{g/L}$. Indeno(1,2,3-cd)pyrene was detected in groundwater sampled at Sacred Spring at $0.605 \mu\text{g/L}$. The EPA tap water screening level for indeno(1,2,3-cd)pyrene is $0.29 \mu\text{g/L}$. The Permittees must instruct GEL Laboratories, LLC to adjust its analytical methods so that practical quantitation limits are lower than screening level values for all analytes.

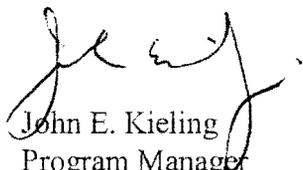
Comment 6. Sampling of Rio Grande at Otowi and Buckman Diversion SW

In the 2009 Interim Facility-Wide Groundwater Monitoring Plan, the Permittee indicated that surface water at Rio Grande at Otowi and at Buckman Diversion SW would be sampled in September/October 2009. However, there is no indication in the PMR that these surface water locations were sampled. The Permittees must address this issue in the next PMR.

Messrs. Rael and Graham
April 29, 2010
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Please contact Patricia Stewart of my staff at (505) 476-6059 should you have any questions.

Sincerely,



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File: Reading and LANL White Rock Watershed, 2010