



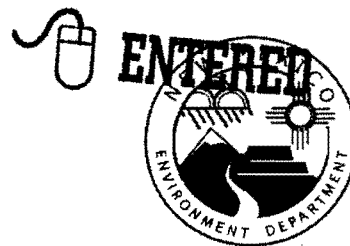
BILL RICHARDSON
Governor

DIANE DENISH
Lieutenant Governor

TAD
NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us



RON CURRY
Secretary

SARAH COTTRELL
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 10, 2010

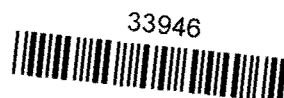
George J. Rael
Federal Project Director
Environmental Projects Office
U.S. Department of Energy
National Nuclear Security Administration
Los Alamos Site Office
3747 West Jemez Rd, MS A316
Los Alamos, NM 87544

Michael J. Graham
Associate Director Environmental Programs
Los Alamos National Security, L.L.C.
P.O. Box 1663, MS M991
Los Alamos, NM 87545

**RE: REVIEW OF PERIODIC MONITORING REPORTS FOR
MORTANDAD AND SANDIA WATERSHEDS,
AUGUST 3 – AUGUST 19, 2009 AND NOVEMBER 2 – NOVEMBER 20,
2009, LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-10-054 AND HWB-LANL-10-067**

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) *Periodic Monitoring Report for Mortandad and Sandia Watersheds, August 3 – August 19, 2009* dated March, 2010 and referenced by LA-UR-10-0939/EP2010-0060 and *Periodic Monitoring Report for Mortandad and Sandia Watersheds, November 2 – November 20, 2009* dated May 2010 and referenced by LA-UR-10-1776/EP2010-0194 (Reports). NMED has reviewed the Reports and provides the following comments.



Comments for Mortandad and Sandia Watersheds, August 3 – August 19, 2009:

1. The second sentence of the first paragraph in Section 4.2 on page 4 states, “The screening levels with which the results are compared are presented in Table 4.2-1.” Table 4.2-1 lists the sources of the screening levels, but not the actual screening level values. For clarification, in future reports the statement cited above must be revised to state that the Table lists the source of screening levels.
2. The first sentence of the third paragraph in Section 4.2.3 on page 6 indicates that perchlorate concentrations exceeded the screening level in samples obtained from four alluvial wells. However, Tables C-3 and D-9 indicate that perchlorate concentrations exceeded the screening level in five alluvial wells. MCO-7.5 was omitted from the discussion. The error was continued in Section 5.2.3 on page 8 where the Permittees stated that twenty-nine detections in groundwater samples collected during the periodic monitoring event (PME) for Mortandad Canyon exceeded screening levels. The total number of groundwater detections that were above screening levels was thirty. The Permittees must ensure that the discussions accurately reflect tabulated data in future reports.
3. Locations of R-12 MP1A and MP2A are listed in Table 2.0-2 under the heading “Regional Aquifer”. These R-12 ports are listed as “Intermediate Source Aquifer” locations in the 2009 Interim Facility-Wide Groundwater Monitoring Plan (IFGMP). The Permittees must refer to the correct corresponding aquifers in future reports.
4. Footnote “c” below Table 2.0-2 should state, “See Table 3.4-2 for explanation.” The Permittees must ensure accurate footnote references in future reports.
5. Sandia Watershed location SCA-1 was listed as dry in Table 2.0-2. However, field data for SCA-1 are presented on pages A-47 and A-48 and results of general inorganics analyses for SCA-1 are presented on pages C-264 and C-265. The Permittees must ensure that tabulated information is accurate in future reports.

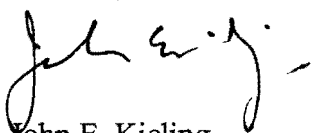
Comments for Mortandad and Sandia Watersheds, November 2 – November 20, 2009

1. The second sentence of the first paragraph in Section 4.2 on page 4 states, “The screening levels with which the results are compared are presented in Table 4.2-1.” Table 4.2-1 lists the sources of the screening levels, but not the actual screening level values. For clarification, in future reports the statement cited above must be revised to state that the Table lists the source of screening levels.
2. Tabulated information in Table 2.0-1 indicates that groundwater levels in Intermediate and Regional locations in both the Mortandad and Sandia watersheds were measured manually. However, data from transducer readings are presented in Table B-1 for Intermediate and Regional locations. The Permittees must ensure agreement between data tables and summary tables in future reports.

3. Information presented in Table 2.0-2 indicates that location R-10 Port P1A and R-10 Port P2A were sampled on November 10, 2009. However, the laboratory analytical reports indicate that these locations were sampled more than seven weeks earlier on September 23. The Permittees must ensure agreement between data tables and summary tables in future reports.
4. Results are presented in Table C-3 for Mortandad location R-16 screen 2 Port ID 8861 for general inorganics, perchlorate and tritium (as scheduled) and for unscheduled target analyte list (TAL) metals, volatile organic analysis (VOAs) and radionuclides. TAL metals, VOAs and radionuclides are scheduled for quarterly sampling and analyses in R-16 screen 3 Port ID 591. R-16 screen 3 was reported as being rehabilitated in the previous Periodic Monitoring Report. However, there is no mention of R-16 screen 3 in the current Report. It appears that the Permittees elected to sample R-16 Screen 2 in place of R-16 Screen 3 for the TAL metals, VOAs and radionuclides. The Permittees must explain the deviation and explain the omission of R-16 screen 3 Port ID 591 from the Report. The Permittees' explanations must be submitted with the next Periodic Monitoring Report submittal and reference this Report and all applicable page and table numbers.

Please contact Pat Stewart at (505) 476-6059 should you have any questions.

Sincerely,



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

cc: J. Kielling, NMED HWB
D. Cobrain, NMED HWB
M. Dale, NMED HWB
P. Stewart, NMED HWB
R. Kulis, NMED HWB
N. Dhawan, NMED HWB
S. Yanicak, NMED DOE OB, MS J993
T. Skibitski, NMED DOE OB
L. King, EPA 6PD-N
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