



NEW MEXICO
ENVIRONMENT DEPARTMENT



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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 23, 2010

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Federal Project Director
Environmental Projects Office
US Department of Energy/
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Associate Director Environmental Programs
Los Alamos National Security, L.L.C.
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**RE: REVIEW OF PERIODIC MONITORING REPORTS FOR PAJARITO
WATERSHED, AUGUST 31 – SEPTEMBER 17, 2009, DECEMBER 1 –
DECEMBER 17, 2009 AND FEBRUARY 22 – MARCH 12, 2010
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-10-018, HWB-LANL-10-037 and HWB-LANL-10-065**

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 Pajarito Watershed, August 31 – September 17, 2009* dated March 2010 and referenced by LA-UR-10-0942/EP2010-0073; *Periodic Monitoring Report for Pajarito Watershed, December 1 – December 17, 2009* dated May 2010 and referenced by LA-UR-10-1773/EP2010-0202; and *Periodic Monitoring Report for Pajarito Watershed, February 22 – March 12, 2010* dated August 2010 and referenced by LA-UR-10-4823/EP2010-0320 (Reports). NMED has reviewed the Reports and provides the following comments.

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Comments for the August 31 – September 17, 2009 Report:

1. The third sentence of the first paragraph in Section 4.2 on page 3 states, “The screening levels with which the results are compared are shown in Table 4.2-1.” A single sentence on page 4 states, “The screening levels applied to all media and their sources are listed in Table 4.2-1. However, Table 4.2-1 lists the sources of the screening levels, not the actual screening levels. For clarification in future reports, the statements cited above must be revised to state that the Table lists the source of screening levels.
2. The cause for no data reported for location R-19, Screens 5-7 was “Samples cancelled by Tim Goering on 09/18/2009.” The Permittees must provide an explanation for cancelling sample collection or analyses in future reports.

Comment for the August 31 – September 17, 2009 and December 1- December 27, 2009 Reports:

3. The Permittees reported, in Tables 2.0-1 and 3.4-1, that two Base Flow locations were not sampled because they were dry; Pajarito above Two Mile (PBF-4) and Two Mile above Pajarito (PBF-3). The names of these two locations likely correspond to two Base Flow locations listed in the Interim Facility-Wide Groundwater Monitoring Plan (IFGMP); Pajarito above Two Mile (E-243) and Two Mile above Pajarito (E-244), respectively. The Permittees must ensure that location or sampling station names in reports are consistent with the IFGMP.

Comment for the December 1- December 27, 2009 Report:

4. NMED noted that the concentration of silicon dioxide in the groundwater sample collected in R-21 at Port 1761 was 71,100 mg/L. This concentration is 1000X concentrations detected in the three previous sampling events. This may be an error in the reported unit of measure. However, the Permittees did not discuss it as being inconsistent with data reported from previous monitoring events in this watershed. The Permittee must identify all data that are not consistent with data reported from previous monitoring events in future reports.

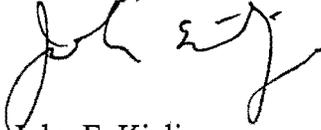
Comment for the February 22 – March 12, 2010 Report:

5. According to Table 2.0-1 the cause for no data reported for location 3MAO-2 was “cancelled by project lead.” However, according to Table 3.4-1 the location was not sampled because it was dry. The Permittees must provide consistent reasons for not sampling a location. Further, if the reason for not sampling a location is due to it being cancelled the Permittee must provide an explanation for cancelling sample collection or analyses in future reports.

Messrs. Rael and Graham
September 23, 2007
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No revision to the Reports is necessary. Please contact Pat Stewart at (505) 476-6059 should you have any questions.

Sincerely,



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

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File: Reading and LANL 2010 and Pajarito Watershed PMR