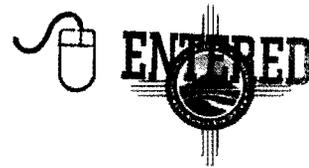


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Date: **NOV 18 2010**
Refer To: EP2010-0500

John Kieling, Program Manager
Permits Management Program
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303



Subject: Submittal of the Response to the Review of Periodic Monitoring Reports for Mortandad and Sandia Watersheds, January 25–February 12, 2010

Dear Mr. Kieling:

This letter provides responses to New Mexico Environment Department’s review of subject report.

If you have any questions, please contact Steve Paris at (505) 606-0915 (smparis@lanl.gov) or Hai Shen at (505) 665-5046 (hshen@doeal.gov).

Sincerely,

Michael J. Graham, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,

George J. Rael, Manager
Environmental Projects Office
Los Alamos Site Office



MG/GR/DM/SP:sm

Enclosures: Two hard copies with electronic files – Response to the Review of Periodic Monitoring Reports for Mortandad and Sandia Watersheds, January 25–February 12, 2010 (LA-UR-10-7592)

Cy: (w/enc.)
James Bearzi, NMED-HWB, 2905 Rodeo Park Drive East, Bldg 1, SFNM 87505
Neil Weber, San Ildefonso Pueblo
Hai Shen, DOE-LASO, MS A316
Steve Paris, EP-CAP, MS M992
RPF, MS M707 (w/ two CDs)
Public Reading Room, MS M992

Cy: (Letter and CD and/or DVD only)
Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-DOE-OB, MS M894
David Rogers, EP-ET, MS M992
William Alexander, EP-BPS, MS M992

Cy: (w/o enc.)
Tom Skibitski, NMED-OB, Santa Fe, NM
Annette Russell, DOE-LASO (date-stamped letter emailed)
Craig Douglass, EP-CAP, MS M992 (date-stamped letter emailed)
Michael J. Graham, ADEP, MS M991 (date-stamped letter emailed)

LANL Response

2. Manual water levels collected from the transducer by the sampling team are reported in Table 2.0-1. These measurements are used to monitor drawdown during sampling. The water levels reported in Appendix B go through a quality assurance process that includes corrections to the measurement datum and for atmospheric pressure variations.

Corrections that are due to the quality assurance process account for differences between field-measured water levels reported in Table 2.0-1 and those reported in Appendix B. The field-measured water levels are accurate on a relative basis and are suitable for meeting sampling requirements.

In order to provide consistency in future periodic monitoring reports, LANL will omit from Table 2.0-1 the water levels collected from the transducer by the sampling team. The water levels reported in Appendix B meet the Consent Order reporting requirements.

NMED Comment

3. *The Permittees reported, in Table 2.0-2, that the transducer for location R-10 P1A was malfunctioning on the sample collection date, February 9, 2010. No manual measurement of the water level was provided. However, data for location R-10 P1A in Table B-2 do not appear to be the result of malfunction. There is no indication in Table B-2 that the water levels measured by the transducer are incorrect or suspect. The Permittees must explain the malfunction and reevaluate water level records for the location R-10 P1A and correct the elevations as necessary in the database and future reports.*

LANL Response

3. Manual water levels collected from the transducer by the sampling team are reported in Table 2.0-1. These measurements are used to monitor drawdown during sampling.

The water level reported in Appendix B is the first measurement of the day. At the time of sampling, the sampling team was unable to obtain a reading from the transducer. For the water-level data in Appendix B, the transducer was functioning properly at the reported times.

**Response to the Review of Periodic Monitoring Report for Mortandad and Sandia Watersheds,
January 25–February 12, 2010
Los Alamos National Laboratory
EPA ID #NM0890010515 HWB-LANL-10-068,
Dated October 14, 2010**

INTRODUCTION

To facilitate review of this response, the New Mexico Environment Department's (NMED's) comments are included verbatim. Los Alamos National Laboratory's (LANL's or the Laboratory's) responses follow each NMED comment.

COMMENTS

NMED Comment

1. *In Table 2.0-1, the Permittees erroneously reported the water level for MCOI-5 as 6316.34 ft. This is the water level for MCOI-4. According to Table B-1 the correct water level for MCOI-5 is 6140.58 ft. The Permittees must report accurate water levels in future reports.*

LANL Response

1. The water level for MCOI-5 was reported incorrectly in Table 2.0-1 as a result of a transcription error.

Manual water levels collected from the transducer by the sampling team are reported in Table 2.0-1. These measurements are used to monitor drawdown during sampling. The water levels reported in Appendix B go through a quality assurance process that includes corrections to the measurement datum and for atmospheric pressure variations.

In order to provide consistency in future periodic monitoring reports, LANL will omit from Table 2.0-1 the water levels collected from the transducer by the sampling team. The water levels reported in Appendix B meet the Compliance Order on Consent (Consent Order) reporting requirements.

NMED Comment

2. *Most transducers appeared to be functional on the sample collection dates listed in Table 2.0-1. The Permittees also reported manual water level measurements for all locations. Most transducer and manual water level measurements agree, within fractions of an inch. However, two water level measurements that were obtained manually did not agree with the transducer water level measurements. The manually recorded water level for location R-33 was reported as 5840.43 ft above mean sea level (amsl), but the water level measured by the transducer was 5845.19 ft. (see Table B-1). The manually recorded water level for location R-35a was reported as 5827.01 ft amsl, but the water level measured by the transducer was 5829.3 ft amsl (see Table B-1). The Permittees must explain these discrepancies in the water level measurements and make equipment repairs as necessary.*