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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 29, 2008

Susan G. Stiger
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Environmental Programs
Los Alamos National Laboratory
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Los Alamos, NM 87545

David Gregory
Federal Project Director
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**RE: NOTICE OF DISAPPROVAL OF PERIODIC MONITORING REPORT
FOR SANDIA WATERSHED, NOVEMBER 7 – NOVEMBER 19, 2007
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-08-015**

Dear Ms. Stiger and Mr. Gregory:

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 Monitory Report for Sandia Watershed, November 7 – November 19, 2007* (PMR), dated July 2008 and referenced by LA-UR-08-4698/EP2008-0372. The NMED has reviewed the PMR and hereby issues this Notice of Disapproval (NOD).

30128



General Comment:

The Permittees frequently refer to the 2007 Interim Facility-Wide Groundwater Monitoring Plan (IFGMP) with the citation "(LANL 2006, 094043)". Section 7.0 does not list the 2007 Interim Facility-Wide Groundwater Monitoring Plan LA-UR-07-3271. In future submittals, the Permittees must properly identify the cited documents.

Specific Comments:

1. Section 4.2.2, Groundwater, page 5:

Chromium was detected at 552 µg/L in unfiltered groundwater sampled from alluvial well SCA-2. The Permittees stated that the concentration is consistent with data reported from previous samplings. However, this concentration is over five times the U. S. Environmental Protection Agency Maximum Contaminant Level (100 µg/L) and it is 100 times the concentration that was previously detected at SCA-2. The Permittees must discuss the contaminants that are detected at concentrations that are not consistent with previous detections. The NMED is aware that the Sandia Canyon Investigation Report, with detailed discussions, may be submitted in the near future. However, the Permittees must briefly discuss the potential sources and the significant increase in the concentration of chromium detected in SCA-2 in the Analytical Data Results Section of the PMR.

2. Section 4.2.2, Groundwater, page 5:

Bis(2-ethylhexyl)phthalate was detected at 51.2 µg/L in groundwater sampled from alluvial well SCA-4. This contaminant was not detected in the field blank, DI blank or in a prior sample event. The Permittees must briefly discuss the potential source(s) and the detection of bis(2-ethylhexyl)phthalate in SCA-4 in the Analytical Data Results Section of the PMR.

3. Table 3.4-1, Observations and Deviations, page 13:

Table 2.0-1, entitled Monitoring Locations and General Information, indicates that base flow data for the surface water sample location "Sandia below Wetlands" is not available. According to the 2007 IFGMP Table 3.3-1, base flow data for this site is monitored continuously. PMR Table 3.4-1 (Observations and Deviations) does not describe this deviation. The Permittees must explain why the datum is missing or why a relevant portion of continuously monitored data is not available. The Permittees must provide a replacement Table 3.4-1.

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4. Table 3.4-1, Observations and Deviations, page 13:

In place of results from groundwater sampled from two screens in the well R-12, that is awaiting rehabilitation, data are presented from wells R-35a and R-35b. PMR Table 3.4-1 (Observations and Deviations) does not describe this deviation. The Permittees must explain the reason(s) for substitutions. The Permittees must provide a replacement Table 3.4-1.

5. Appendix G, Analytical Reports and Previously Unreported Data:

This appendix does not include previously unreported analyses of tritium in groundwater that was sampled between June 4 and 24, 2007. Those results were not available for inclusion in the Sandia Watershed February 13-25, 2007 and June 4-24, 2007 Periodic Monitoring Report. The NMED is aware that the Permittees would not report nondetects. However, it is not clear if the tritium data are still not available, if the results were nondetects or if they were inadvertently not included with the current report. The Permittees must provide the tritium data or an explanation for their omission.

The Permittees must address all comments and submit a response by November 24, 2008. All submittals (including tables) must be in the form of two paper copies and one electronic copy in accordance with Section XI.A of the Order.

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

Sincerely,



James Bearzi
Chief
Hazardous Waste Bureau

cc: J. Kieling, NMED HWB
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File: LANL 2008 Sandia Watershed PMR
LANL-08-015