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NEW MEXICO ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 14, 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
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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 REPORT FOR MORTANDAD AND SANDIA WATERSHEDS, JANUARY 25 – FEBRUARY 12, 2010
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-10-068

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, January 25 – February 12, 2010* dated August 2010 and referenced by LA-UR-10-4822/EP2010-0319 (Report). NMED has reviewed the Report and provides the following comments.

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.



- 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.
- 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.

The Permittees' explanations must be included in the next Periodic Monitoring Report submittal and reference this Report and all applicable associated page and table numbers. 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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