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ENTERED



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**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

November 4, 2016

Doug Hintze, Manager  
U.S. Department of Energy  
EM-Los Alamos Field Office, DOE  
3747 West Jemez Rd, MS A316  
Los Alamos, NM 87544

Michael T. Brandt, Associate Director  
Environment, Safety, and Health  
Los Alamos National Laboratory  
P.O. Box 1663, MS M991  
Los Alamos, NM 87545

**RE: PERIODIC MONITORING REPORT FOR  
TECHNICAL AREA 54 MONITORING GROUP,  
THIRD QUARTER, MONITORING YEAR 2016  
LOS ALAMOS NATIONAL LABORATORY  
EPA ID#NM0890010515  
HWB-LANL-16-040**

Dear Messrs. Hintze and Brandt:

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 Technical Area 54 Monitoring Group, Third Quarter, Monitoring Year 2016* (Report), dated August 2016 and referenced by LA-UR-16-26214/EP2016-0102. The Report was received on August 24, 2016. NMED has reviewed the Report and has the following comments:

**COMMENTS:**

- 1. Missing Transducer/Manual Groundwater Level Data**

**Appendix B, Page B-34:**

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**NMED Comment:** Transducer (continuous) and manual groundwater level data were not reported for R-20 S1 from February 12, 2016, through February 28, 2016.

**Appendix B, Pages B-49-50:**

**NMED Comment:** Transducer (continuous) and manual groundwater level data were not reported for R-20 S2 from May 12, 2015, through February 28, 2016.

**Appendix B, Page B-90:**

**NMED Comment:** Transducer (continuous) and manual groundwater level data were not reported for R-23i S1 from January 22, 2016, through April 11, 2016. No groundwater level measurement was reported for the April 11, 2016, groundwater sampling event.

**Appendix B, Page B-92:**

**NMED Comment:** Transducer (continuous) and manual groundwater level data were not reported for R-23i S2 from October 27, 2015, through January 27, 2016.

**Appendix B, Page B-99:**

**NMED Comment:** Transducer (continuous) and manual groundwater level data were not reported for R-23i S3 from November 4, 2015, through December 20, 2015.

**Appendix B, Page B-237:**

**NMED Comment:** Transducer (continuous) and manual groundwater level data were not reported for R-41 S2 from February 5, 2016, through April 11, 2016. No groundwater level measurement was reported for the April 11, 2016, groundwater sampling event.

**Appendix B, Page B-512:**

**NMED Comment:** Transducer (continuous) and manual groundwater level data were not reported for R-52 S2 from October 22, 2015, through December 22, 2015.

Continuous and manual groundwater level measurements are described in the approved *MY2016 Interim Facility-Wide Groundwater Monitoring Plan*. In the future, provide complete continuous and manual groundwater level data in the Report, including the water level measurement on the groundwater sampling date, or discuss the gaps in reporting of the groundwater level data; and provide groundwater sample results or provide comment on the deviation.

**2. Laboratory Holding Time Exceedances**

**NMED Comment:** Laboratory validation reports reveal exceedances of holding times that are not discussed in the Report. For example, the R-23i S1 Data Package 2016-1027,

Case Narrative, Page 15 of 72 revealed the following for a sample collected for volatile organic compounds (VOCs) on April 11, 2016, and analyzed on April 27, 2016:

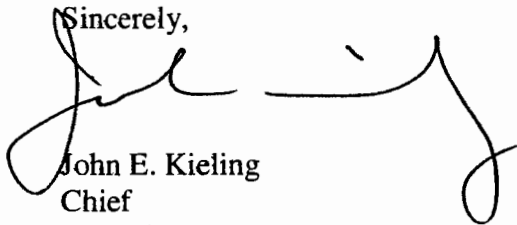
***Holding Time Specifications***

*GEL assigns holding times based on the associated methodology, which assigns the date and time from sample collection or sample receipt. Those holding times expressed in hours are calculated in the ALPHALIMS system. Those holding times expressed as days expire at midnight on the day of expiration. Samples 395106001 (CAPA-16-114714), 395106002 (CAPA-16-114680), 395106003 (CAPA-16-114715) and 395106004 (CAPA-16-114681) were not analyzed within the recommended holding. However, the samples were analyzed within two times the holding period. This satisfies the client criteria. The results are qualified accordingly.*

In the future, avoid exceeding holding times. In the event that holding times are exceeded, provide a discussion on the exceedance in the Report and any effects it has on data quality.

Please contact Mike Space at (505) 476-6059 should you have any questions or comments.

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB  
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File: Reading and LANL 2016, Groundwater, Technical Area 54 Monitoring Group, Third  
Quarter  
LANL 16-040