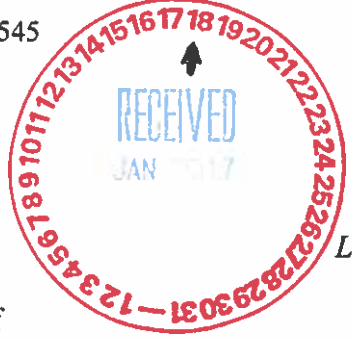


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ENTERED



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Date: **JAN 18 2017**
Refer To: ADEM-17-0005
LAUR: n/a
Locates Action No.: n/a

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

Subject: Response to Review of the Periodic Monitoring Report for Pajarito General Surveillance Monitoring Group, Third Quarter, Monitoring Year 2016

Dear Mr. Kieling:

The New Mexico Environment Department (NMED) provided comments on October 11, 2016, on the Periodic Monitoring Report for Pajarito General Surveillance Monitoring Group, Third Quarter, Monitoring Year 2016, submitted in August 2016 by the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (collectively, the Permittees). To facilitate review of the Permittees's responses, NMED's comments are included verbatim, followed by the Permittees's responses.

NMED Comment:

Appendix B, Page B-1:

Transducer (continuous) groundwater level data were not reported for 18-MW-18 from January 18, 2016 through April 8, 2016. The groundwater sampling event occurred on April 8, 2016. Continuous groundwater level measurements are described in the approved MY2016 Interim Facility-Wide Groundwater Monitoring Plan. In the future, provide complete continuous groundwater level data, including the water level measurement on the groundwater sampling date, or describe why there are gaps in reporting of the continuous groundwater level data.



LANL Response:

Los Alamos National Laboratory (the Laboratory) recognizes that measuring the groundwater level before purging and sampling a monitoring location is a requirement of the Compliance Order on Consent. The Interim Facility-Wide Groundwater Monitoring Plan for Monitoring Year 2017 was prepared to comply with this requirement, and all future periodic monitoring reports (PMRs) will note any instances when a groundwater level measurement was not obtained before purging and sampling.

In addition to collecting groundwater level data before purging and sampling, the Laboratory collects groundwater level data "continuously" (e.g., hourly, daily) for most monitoring locations, and these data are voluntarily provided in PMRs. Any gaps in the continuous groundwater level records presented in the PMRs are a result of one or more of the following reasons:

- Dry well
- Water level falls below level monitoring pressure transducer
- Well not equipped with a level transducer
- Level transducer not functioning properly (including failure)
- Transducer temporarily removed from well for maintenance and/or calibration

Section 3.3, Groundwater Elevations and Base Flow Observations, of future PMRs will include the above reasons for any gaps in continuous groundwater level data.

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

Sincerely,



Bruce Robinson, Program Director
Environmental Remediation Program
Los Alamos National Laboratory

Sincerely,



David S. Rhodes, Director
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office

BR/DR/SP:sm

Cy: (date-stamped letter emailed)
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Public Reading Room (EPRR)
PRS Database
ADESH Records