

Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

NEW MEXICO ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1 Santa Fe, New Mexico 87505-6313 Phone (505) 476-6000 Fax (505) 476-6030 www.env.nm.gov



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 7, 2020

Arturo Duran
Designated Agency Manager
Environmental Management
U.S. Department of Energy
Los Alamos Field Office
P.O. Box 1663 MS M984
Los Alamos, NM 87544

RE: 2020 ANNUAL PERIODIC MONITORING REPORT FOR THE TECHNICAL AREA 16 260

MONITORING GROUP, PAJARITO CANYON AND WATER CANYON/CAÑON DE VALLE

WATERSHEDS, REVISION 1

LOS ALAMOS NATIONAL LABORATORY

EPA ID#NM0890010515

HWB-LANL-20-051

Dear Mr. Duran:

The New Mexico Environment Department (NMED) received the United States Department of Energy's (DOE) 2020 Annual Periodic Monitoring Report for the Technical Area 16 260 Monitoring Group, Pajarito Canyon and Water Canyon/Cañon de Valle Watersheds, Revision 1 (Revised Report) on December 3, 2020. The Revised Report is dated December 2020 and referenced by EM2020-0591.

DOE submitted the 2020 Annual Periodic Monitoring Report for the Technical Area 16 260 Monitoring Group, Pajarito Canyon and Water Canyon/Cañon de Valle Watersheds (Report) to NMED on August 31, 2020. On September 28, 2020, NMED issued to DOE via e-mail a draft comment letter on the Report. DOE submitted responses to the draft comments on October 13, 2020. NMED accepted DOE's response with the submittal of a report revision via an October 19, 2020 e-mail. DOE submitted the Revised Report on December 3, 2020. NMED reviewed the Revised Report on December 7, 2020 and found that the Revised Report has adequately addressed NMED's draft comments. NMED draft comments and DOE responses are attached to this correspondence.

Should you have any questions regarding this correspondence, please contact Christopher Krambis (505) 476-3078.

Sincerely,

Kevin Digitally signed by Kevin Pierard Date: 2020.12.07 16:19:04 -07'00'

Kevin M. Pierard, Chief Hazardous Waste Bureau

Enclosure:

1. Response to the Review, Annual Periodic Monitoring Report for the Technical Area 16 260 Monitoring Group, Pajarito Canyon and Water Canyon/Cañon de Valle Watersheds, August 2020, LANL-20-051 Dated September 28, 2020

cc w/out Attachment:

- N. Dhawan, NMED HWB
- C. Krambis, NMED HWB
- C. Catechis, NMED-DOE-0B
- S. Yanicak, NMED-DOE-0B
- L. King, US EPA Region 6
- R. Martinez, San Ildefonso Pueblo, NM
- D. Chavarria, Santa Clara Pueblo, NM
- C. Rodriguez, EM-LA
- H. Shen, EM-LA
- C. Fountain, EM-LA
- S. Veenis, N3B
- E. Day, N3B
- C. Maupin, N3B
- P. Maestas, N3B
- W. Alexander, N3B

File: Reading and LANL 2020, TA-16, 2020 Annual Periodic Monitoring Report for the Technical Area 16 260 Monitoring Group, Pajarito Canyon and Water Canyon/Cañon de Valle Watersheds, Revision 1

HWB-LANL-20-051

Response to the Review, Annual Periodic Monitoring Report for the Technical Area 16 260 Monitoring Group, Pajarito Canyon and Water Canyon/Cañon de Valle Watersheds, August 2020, LANL-20-051 Dated September 28, 2020

To facilitate review of this response, the New Mexico Environment Department's (NMED's) comments are included verbatim. The U.S. Department of Energy (DOE) Environmental Management Los Alamos Field Office responses follow each NMED comment. All information associated with analyses of radionuclides is voluntarily provided to NMED in accordance with DOE policy.

INTRODUCTION

Specific Comments:

1. Section 2.0 Scope of Activities, Pages 2 and 3.

DOE Statement: Four of the 10 wells completed within the deep regional aquifer are on the watch list.

NMED Comment: The four wells on the watch list provided on page 3 include R-26 PZ-2, R-63i, R-25b and CdV-R-37-2 S2. However, Figure 2.0-1 indicates that three of these wells are not completed within the regional aquifer as stated on page 2. Please clarify the statement on page 2.

DOE Response: R-26 PZ 2 was completed within the perched-intermediate; R-63i 2 was completed within the perched-intermediate; R-25b was completed within the perched-intermediate; and CdV-R-37-2 S2 was completed within the deep regional aquifer.

This statement will be updated to say: Three of the 12 wells completed within the perched-intermediate, and 1 of the 10 wells completed within the deep regional aquifer are on the watch list.

2. Figure 5.2-2 TA-16 260 monitoring group unfiltered RDX concentrations in $\mu g/L$, Page 22.

NMED Comment: Except for well 16-61439, none of the values shown in Figure 5.2-2 reflect RDX concentrations as indicated by the figure title. The values provided in Figure 5.2-2 appear to be the barium concentrations provided on Figure 5.2-1 on page 21. In addition, Figure 5.2-2 does not reflect the comparatively more widespread distribution of RDX exceedances at TA-16 260. Please revise Figure 5.2-2 to include the correct RDX concentrations and the correct distribution of RDX exceedances.

DOE Response: Figure 5.2-2 has been revised to correct RDX concentrations and correct the distribution of RDX exceedances.

Please provide your response within 15 days of receipt of these comments.