



February 2, 2023

Arturo Duran
Designated Agency Manager
U.S. Department of Energy
Environmental Management-Los Alamos Field Office
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RE: REVIEW
2022 ANNUAL PERIODIC MONITORING REPORT FOR THE TECHNICAL AREA 16 260
MONITORING GROUP, PAJARITO CANYON AND WATER CANYON/CANON DE VALLE
WATERSHEDS (AUGUST 2022)
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-22-064

Dear Mr. Duran:

The New Mexico Environment Department (NMED) has received the United States Department of Energy's (DOE) *2022 Annual Periodic Monitoring Report for the Technical Area 16 260 Monitoring Group, Pajarito Canyon and Water Canyon/Canon de Valle Watersheds* (Report), dated August 2022 and referenced by EM2022- 0165. The Report was received by NMED on August 30, 2022.

NMED reviewed the Report and has the following comments:

- Results for Low-Level Tritium were not reported in Table C.1 or in Table C.2 for many of the sample locations. Provide data for Low-Level Tritium when it becomes available.
- Results for PFAS were not reported in Table C.1 or in Table C.2 for many of the sample locations. However, total PFAS was reported for the sample location CDV-16-02659. Revise the text to include PFAS results for the required sample locations or revise the text to include a discussion addressing the non-detects for PFAS.
- Table 6.4-1 of the *Interim Facility-Wide Groundwater Monitoring Plan for the 2021 Monitoring Year, October 2020-September 2021, Revision 1* shows that the sample location 16-26644 should be sampled quarterly for high explosives and RDX degradation products using the SW-846:8330 series. However, Table C.1 of the Report states that location 16-26644 had samples collected on 09/23/2021, 03/03/2022, and had two samples collected on 12/14/2021. Revise the text to include high explosives sample results for the missing quarter. If results are not available, revise the text to include this deviation.
- Table 6.4-1 of the *Interim Facility-Wide Groundwater Monitoring Plan for the 2021 Monitoring Year, October 2020-September 2021, Revision 1* shows that the sample location R-18 should be sampled quarterly for high explosives and RDX degradation products using the SW-846:8330

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series. However, Table C.1 of the Report states that location R-18 had samples collected on 09/17/2021, 12/07/2021, and 03/08/2021. Revise the text to include high explosives sample results for the missing quarter. If results are not available, revise the text to include this deviation.

- Table 2.1-1, *TA-16 260 Monitoring PME Observations and Deviations*, shows that monitoring location R-58 was not sampled due to mechanical problems for all quarters of the monitoring year evaluated in the Report (Monitoring Year (MY) 2021 Quarter 3, MY 2021 Quarter 4, MY 2022 Quarter 1, and MY 2022 Quarter 2). Revise Table 2.1-1 to include specific mechanical problems encountered and the actions taken to resolve the problem.

NMED notes that this is a periodic monitoring report and this review does not constitute approval of the reference documents and content of the Report.

Should you have any questions regarding this correspondence, please contact Caitlin Martinez at (505) 690-4742.

Sincerely,

Rick Shean

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Rick Shean
Chief
Hazardous Waste Bureau

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Pajarito Canyon and Water Canyon/Canon de Valle Watersheds
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