



February 7, 2023

Arturo Duran
Designated Agency Manager
U.S. Department of Energy- Environmental Management
Los Alamos Field Office
1200 Trinity Drive, Suite 400
Los Alamos, NM 87544

RE: REVIEW
2022 ANNUAL PERIODIC MONITORING REPORT FOR BASEFLOW SAMPLING: LOS ALAMOS CANYON, SANDIA CANYON, WATER CANYON, WHITE ROCK CANYON, AND PAJARITO CANYON WATERSHED
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
LANL-22-089

Dear Mr. Duran:

The New Mexico Environment Department (NMED) has received the U.S. Department of Energy's (DOE), National Nuclear Security Administration (NA-LA) and the Office of Environmental Management (EM-LA) Los Alamos field offices, Newport News Nuclear BWXT-Los Alamos, LLC (N3B) and Triad National Security, LLC (Triad) (collectively the Permittees' *2022 Annual Periodic Monitoring Report for Base Flow Sampling: Los Alamos Canyon, Sandia Canyon, Water Canyon, White Rock Canyon, and Pajarito Canyon Watersheds* (Report), dated and received November 29, 2022, and referenced by EM2022-0661.

NMED has completed its review and finds the proposed modifications acceptable in Section 5.3 Sampling Program Modifications. NMED concurs with the increase in sampling frequency from annual to semi-annual for LA Canyon near Otowi Bridge for Dioxin/Furans and nitrosamines.

1. Section 6.2.1 Surface Water (Base Flow), page 9:

The results reported in Section 6.2.1 Surface water (Base Flow) and, Table 5.2-1 Base-Flow Results Above Screening Levels (page 21) do not match the results reported in Tables C-1, and C-2. Section 6.2.1 and Table 5.2-1 report a concentration 7.6E-8 µg/L for hepadichlorodibenodioxin [1,2,3,4,6,7,8-] on October 12, 2021, at Rio Grande at Otowi Bridge. However, NMED notes that the same sample location and date for Tables C-1 and C-2 report a concentration of 5.52E-06 µg/L for hepadichlorodibenodioxin [1,2,3,4,6,7,8-], approximately a

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5.44E-06 µg/L difference.

The Permittee must resolve the discrepancy between Section 6.2.1 and the three (3) Tables and must provide a revised Base Flow Monitoring Report for NMED review.

2. Table 2.1-1 Base-Flow Sampling PME Observations and Deviations, page 16:

NMED notes that at several sampling locations, the Permittees were not able to collect samples due to low base-flow or insufficient water in 2022, 2021, and 2020. For example, at LA Canyon near Otowi Bridge, Water at Beta, and Canon de Valle below MDA P, there was either insufficient water to sample or the base-flow was reported as dry in 2022, 2021, and 2020. It is not clear from the report, if more than one attempt was made per quarter to collect these samples.

The Permittees must review low-sampling events and discuss strategy for partial sampling and analysis in the forthcoming Interim Facility-Wide Monitoring Plan, which prioritizes COPCs for the site.

Should you have any questions or comments, please contact Siona Briley at (505) 690-5160.

Sincerely,

**Rick
Shean**

Rick Shean

Chief

Hazardous Waste Bureau

Digitally signed by
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File: LANL 2023, TA-00, Review 2022 Annual Periodic Monitoring Report for Baseflow
Sampling, November 2022
LANL-22-089

