



DEPARTMENT OF ENERGY
Environmental Management Los Alamos Field Office (EM-LA)
Los Alamos, New Mexico 87544

EMLA-23-BF167-2-1

March 23, 2023

Mr. Dave Cobrain
Acting Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6313



Subject: Response to New Mexico Environment Department Draft Comments on the 2022 Annual Periodic Monitoring Report for the Technical Area 21 Monitoring Group, Los Alamos Canyon Watershed Dated February 2023

Dear Mr. Cobrain:

Enclosed please find two hard copies with electronic files of the "Response to New Mexico Environment Department Comments on the 2022 Annual Periodic Monitoring Report for the Technical Area 21 Monitoring Group, Los Alamos Canyon Watershed Dated February 2023." The responses directly address NMED comments on the report. Tritium results are included on the attached CD, and no changes to the report are required.

If you have any questions, please contact Amanda White at (505) 309-1366 (amanda.white@em-la.doe.gov) or Hai Shen at (505) 709-7600 (hai.shen@em.doe.gov).

Sincerely,

**ARTURO
DURAN**

Digitally signed by
ARTURO DURAN
Date: 2023.03.22
07:50:11 -06'00'

Arturo Q. Duran
Compliance and Permitting Manager
U.S. Department of Energy
Environmental Management
Los Alamos Field Office

Enclosure(s):

Two hard copies with electronic files:
Response to New Mexico Environment Department Comments on the 2022 Annual Periodic Monitoring Report for the Technical Area 21 Monitoring Group, Los Alamos Canyon Watershed Dated February 2023 (EM2023-0136)

cc (letter with CD/DVD enclosure[s]):

Laurie King, EPA Region 6, Dallas, TX
 Dino Chavarria, Santa Clara Pueblo, NM
 Richard Carpenter, City of Santa Fe, NM
 Steven Lynne, Los Alamos County, NM (2 copies)
 Jack Richardson, Los Alamos County, NM
 Steve Yanicak, NMED-DOE-OB
 Justin Ball, NMED-GWQB
 Chris Catechis, NMED-RP
 Cheryl Rodriguez, EM-LA
 Hai Shen, EM-LA

cc (letter emailed without enclosure[s]):

Stephen Hoffman, NA-LA
 Jennifer Payne, LANL
 M. Lee Bishop, EM-LA
 John Evans, EM-LA
 Michael Mikolanis, EM-LA
 David Nickless, EM-LA
 William Alexander, N3B
 Rachel Cowan, N3B
 Tracy Drake, N3B
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 Public Reading Room (EPRR)
 PRS website

**Response to New Mexico Environment Department Comments on the
2022 Annual Periodic Monitoring Report for the Technical Area 21 Monitoring Group,
Los Alamos Canyon Watershed
Dated February 2023**

INTRODUCTION

To facilitate review of this response, the New Mexico Environment Department's (NMED's) comments are included verbatim (in italics). The U.S. Department of Energy (DOE) Environmental Management Los Alamos Field Office's responses follow each NMED comment.

SPECIFIC COMMENTS

NMED Comment

1. *Results for Low-Level Tritium were not reported in Table C.1 or in Table C.2 for locations R-6 and R-7 S3. Please provide data for Low-Level Tritium when it is available.*

DOE Response

1. Per the 2022 Interim Facility-Wide Groundwater Monitoring Plan (IFGMP), Revision 1, low-level tritium sampling was planned and sampled at the following ten locations: R-5 screen 2, R-6, R-64, R-66, R-7 screen 3, R-8 screen 1, R-8 screen 2, R-9, R-9i, and TA-53i. These samples were collected and sent to American Radiation Services, Inc., now called Aleut Analytical, LLC. (ARS), in Port Allen, Louisiana.

ARS is the only laboratory accredited by the DOE Consolidated Audit Program - Accreditation Program for use by the DOE community to perform low-level tritium analyses. The demand for accredited low-level tritium analyses has exceeded the ability of ARS to provide analytical services. The low-level tritium results were uploaded between 149–223 days after sampling. Low-level tritium results for eight locations were uploaded prior to the 2022 Technical Area 21 (TA-21) Periodic Monitoring Report (PMR) submittal on February 28, 2022.

Results for low-level tritium sampling at R-6 on August 26, 2021, and R-7 screen 3 on August 27, 2021, were not received prior to the 2022 TA-21 PMR submittal. These results were uploaded on April 6, 2022, 223 days after sampling at R-6, and 222 days after sampling at R-7 screen 3. The two voluntarily provided low-level tritium results are included in the 2023 TA-21 PMR Appendix C Table 1, which was submitted to NMED on February 28, 2023. In addition, the results are included on the attached CD.