



May 24, 2023

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

RE: REVIEW
2022 ANNUAL PERIODIC MONITORING REPORT FOR THE CHROMIUM INVESTIGATION
MONITORING GROUP, MORTANDAD CANYON AND SANDIA CANYON WATERSHEDS
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-22-035

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 Chromium Investigation Monitoring Group, Mortandad Canyon and Sandia Canyon Watersheds* (Report), dated May 2022 and referenced by EM2022- 0163. The Report was received by NMED on May 31, 2022.

NMED reviewed the Report and has the following comment:

- Results for PFAS were not reported in Table C.1 or Table C.2 for all locations within the chromium investigation monitoring group, with the exception being R-70 S1 and R-70 S2. Please provide data for PFAS collected at locations MCOI-6, R-1, SCI-1, SCI-2, R-11, R-13, R-15, R-33 S1, R-33 S2, R-35a, R-35b, R-36, R-43 S1, R-43 S2, R-44 S1, R-44 S2, R-45 S1, R-45 S2, R-50 S1, R-50 S2, R-61 S1, R-62, R-67 and SIMR-2.
- Results for Low-Level Tritium were not reported in Table C.1 or in Table C.2 for locations SCI-1, R-1, R-13, R-15, R-33 S1 and R-33 S2. Additionally, only one sampling event was reported for the following locations requiring semiannual sampling frequency: R-11, R-35a, R-35b, R-36, R-43 S1, R-43 S2, R-67 and SIMR-2. Finally, results were not included for Quarter 1 of Monitoring Year 2022 (with PME Field Sampling dates 10/12/2021-10/26/2021, 11/02/2021-11/22/2021, or 12/07/2021-12/21/2021) for the following locations: R-44 S1, R-44 S2, R-45 S1, R-45 S2, R-50 S1, R-50 S2, R-61, R-62, R-70 S1 and R-70 S2. Please provide data for Low-Level Tritium when it is available.

- Results for PCBs were not reported in Table C.1 or Table C.2 for sampling location SCI-1. Please provide the biennial PCB data collected for this location.
- Section 6.4, *Remediation System Monitoring*, states that “Tracer sampling data associated with the IM continue to be reported under the progress reports for the chromium plume control IM.” However, after evaluating Appendix A (Analytical Water Quality Data Collected under the Interim Facility-Wide Groundwater Monitoring Plan) of the *Annual Progress Report on Chromium Plume Control Interim Measure Performance, July 2021 through March 2022* (Annual Progress Report), many of the tracer sampling did not occur following the requirements. The *Interim Facility-Wide Groundwater Monitoring Plan for the 2021 Monitoring Year, October 2020-September 2021, Revision 1* (MY 2021 IFGMP) Table 1.7-4 (Analytes, Field Preparation, and Analytical Methods for Tracer Samples Collected under the IFGMP) provides the specific analytes required for each analytical suite for naphthalene sulfonate tracers, sodium perrhenate tracer, and deuterated water tracer. Table 3.4-1 (Interim Monitoring Plan for Chromium Investigation Monitoring Group) of the MY 2021 IFGMP states that sampling will occur for the tracers listed above monthly at multiple locations. This required monthly sampling was not conducted for most of the locations. Provide the monthly naphthalene sulfonate tracer results for R-11, R-35a, R-35b, R-45 S1, R-45 S2, R-70 S1, R-70 S2 and SIMR-2. Provide the monthly sodium perrhenate tracer results for R-11, R-35a, R-35b, R-44 S1, R-44 S2, R-45 S1, R-45 S2, R-70 S1 and R-70 S2. Provide the monthly deuterated water tracer results for R-11, R-35a, R-35b, R-45 S1, R-45 S2, R-70 S1 and R-70 S2. If the sampling was not conducted monthly, revise the text and Table 2.1-1 (Chromium Investigation Monitoring Group PME Observations and Deviations) to accurately reflect the sampling conducted.

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. Please provide the missing data listed above within 30 days of receiving this letter.

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

Sincerely,

**Rick
Shean**

Rick Shean

Designated Agency Manager

Director, Resource Protection Division

New Mexico Environment Department

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