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June 16, 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: 2022 ANNUAL LONG-TERM MONITORING AND MAINTENANCE REPORT FOR THE CORRECTIVE MEASURES IMPLEMENTATION AT FORMER 260 OUTFALL AREA
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-22-069

Dear Mr. Duran,

The New Mexico Environment Department (NMED) received the United States Department of Energy (DOE) submittal titled *2022 Annual Long-Term Monitoring and Maintenance Report for the Corrective Measures Implementation at Former 260 Outfall Area* (Report) on September 27, 2022. The Report is dated September 2022 and is referenced by EM2022-0614. NMED reviewed the Report and has the following comments:

1. **Section 1.2, Conceptual Model for Transport of RDX and Barium, pg. 2.**

   DOE Statement: "*Although the majority of RDX concentrations in discharges from SWSC, Burning Ground, and Martin Springs and 16-61439 (PRB alluvial seep) from 2000 to 2020 were above the screening level, overall concentrations are either less than when first detected, or are declining, likely because of the RDX source-reduction actions that were implemented at Outfall 260 (LANL 2017, 602597).*"
   NMED Comment: Revise the Report to include the results of the Mann-Kendall trend analysis for RDX concentrations at SWSC Spring, Burning Ground Spring, and 16-61439 to provide evidence supporting inclusion of the statement that overall concentrations are declining. Figure E-5 provided the results of the Mann-Kendall trend analysis for RDX at Martin Springs.

2. **Section 2.0, Long-Term Monitoring and Maintenance Sampling and Results, pg. 4.**

   DOE Statement: *"This section presents the data collected for this 2021 annual Long-Term Monitoring and Maintenance Report."*
   NMED Comment: Revise the text to correct the date from 2021 to 2022.

3. **Section 4.0, Discussion and Conclusions, pg. 7.**

DOE Statement: *"This sections discusses the RDX and barium results from the September 2021 and March 2022 sampling events, how they compare with the historical trends (January 2012 through March 2022), and how they support the conceptual model."*
NMED Comment: Revise the typographical error in the text to accurately reflect the dates used for historical trends. The *2021 Annual Long-Term Monitoring and Maintenance Report for the Corrective Measures Implementation at Former 260 Outfall Area (EM2021-0468)* stated that the historical trends date range began in January 2001.

This review is based solely on the information presented in the Report and this letter does not constitute an approval by NMED. Should you have any questions regarding this correspondence, contact Caitlin Martinez (505) 690-4742.

Sincerely,

Rick Shean

Digitally signed by Rick Shean
Date: 2023.06.16 08:05:00 -06'00'

Rick Shean
Designated Agency Manager
Division Director
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cc:
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File: LANL 2023, 2022 Annual Long-Term Monitoring and Maintenance Report for the Corrective Measures Implementation at Former 260 Outfall Area
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