



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

Received

AUG 17 2023

NMED Hazardous Waste Bure

EMLA-23-BF295-2-1

August 17, 2023

Mr. Rick Shean
 Designated Agency Manager
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, NM 87505-6313

Subject: Submittal of the Response to the New Mexico Environment Department Comments on the 2022 Annual Long-Term Monitoring and Maintenance Report for the Corrective Measures Implementation at Former 260 Outfall Area (September 2022)

Dear Mr. Shean:

Enclosed please find two hard copies with electronic files of the "Response to the New Mexico Environment Department Comments on the 2022 Annual Long-Term Monitoring and Maintenance Report for the Corrective Measures Implementation at Former 260 Outfall Area (September 2022)." This submittal is the response to the comments received in the New Mexico Environment Department letter dated June 16, 2022.

If you have any questions or comments, please contact Cheryl Fountain at (505) 695-3292 (cheryl.fountain@em-la.doe.gov) or Cheryl Rodriguez at (505) 414-0450 (cheryl.rodriguez@em.doe.gov).

Sincerely,

**ARTURO
 DURAN**

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 Date: 2023.08.16 14:30:51
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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:

1. Response to the New Mexico Environment Department Comments on the 2022 Annual Long-Term Monitoring and Maintenance Report for the Corrective Measures Implementation at Former 260 Outfall Area (September 2022), Dated June 16, 2023 (EM2023-0507)

cc (letter with enclosure[s] emailed):

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**Response to the New Mexico Environment Department Comments
on the 2022 Annual Long-Term Monitoring and Maintenance Report for the
Corrective Measures Implementation at Former 260 Outfall Area (September 2022),
Dated June 16, 2023**

INTRODUCTION

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

SPECIFIC COMMENTS

NMED Comment

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.

DOE Response

1. Mann-Kendall trend analyses at Martin Springs show declining RDX (hexahydro-1,3,5-trinitro-1,3,5-triazine) concentration trends, and were included in Appendix E.

SWSC Spring, Burning Ground Spring, and 16-61439 do not show statistically significant trends of declining RDX concentration, and therefore were not included in Appendix E. The statement refers to the concentration value being less than the first detected value. The text will be updated to clarify the statement.

Additionally, Appendix E will be updated to provide consistency in Mann-Kendall analysis between the 2022 and 2023 report.

NMED Comment

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.

DOE Response

2. The text will be revised to correct the date from 2021 to 2022.

NMED Comment

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.

DOE Response

3. The text will be revised to accurately reflect the January 2001 start date used for historical Mann-Kendal Trend Analysis. Additionally, a sentence will be added to clarify that the RDX and barium concentration plots on Plate 1 and Plate 2 have a January 2012 start date.