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September 14, 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**  
**INTERIM FACILITY-WIDE GROUNDWATER MONITORING PLAN FOR THE 2024 MONITORING YEAR, OCTOBER 2023-SEPTEMBER 2024**  
**LOS ALAMOS NATIONAL LABORATORY**  
**EPA ID#NM0890010515**  
**HWB-LANL-23-054**

Dear Mr. Duran:

The New Mexico Environment Department (NMED) has received the United States Department of Energy's (DOE) *Interim Facility-Wide Groundwater Monitoring Plan for the 2024 Monitoring Year, October 2023-September 2024* (Plan), dated June 2023 and referenced by EM2023-0265. The Plan was received by NMED on June 13, 2023.

NMED issues the following comments:

1. **Section 1.9, Groundwater-Level and Spring and Base-Flow Discharge Monitoring, pg. 10.**

Revise the Report to clarify that all installed pressure transducers will record the groundwater level data every hour at synoptic times (e.g., 7:00:00). The data will be routinely uploaded to EIM/Intellus to be available to NMED and the public.

2. **Section 1.11, Deviations to the Sampling Requirements, pg. 10-11.**

Revise the Report to include the specification that sampling deviations, as reported in Period Monitoring Reports, must describe the reason why the samples were not collected. Periodic Monitoring Reports that only provide reference to Section 1.11 of the Report is not sufficient and further explanation is required.

3. **Table 3.4-1, Interim Monitoring Plan for Chromium Investigation Monitoring Group, pg. 62.**

Increase the sampling frequency for metals and general inorganics from semi-annually to quarterly for location SCI-1.

4. **Table 3.4-1, Interim Monitoring Plan for Chromium Investigation Monitoring Group, pg. 62.**

Increase sampling frequency for metals, low-level tritium, and general inorganics from quarterly to monthly for locations CrPZ-1, CrPZ-2a, CrPZ-3, Cr PZ-4, and CrPZ-5.

5. **Table 8.3-1, Interim Monitoring Plan for General Surveillance Monitoring Group, pg. 69.**

Increase sampling frequency for metals and inorganics from biennial to annual for location CDBO-6.

6. **Table B-4.0-2, Analyte Method Detection Limits and Practical Quantitation Limits for Groundwater Samples Collected in Monitoring Years 2020 and 2021 and Analyzed by Accredited Contract Laboratories, pg. B-25-B-28.**

Several analytes in the semivolatile organic compounds (SVOC) suite, utilizing analytical method SW-846:8270, have Method Detection Limits (MDLs) that exceed the screening value. Consider an alternative analytical method with a lower MDL for the SVOCs listed below.

- a. **Table B-4.0-2, pg. B-25:** The maximum MDL for Benzidine exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- b. **Table B-4.0-2, pg. B-25:** The maximum MDL for Benzo(a)anthracene exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- c. **Table B-4.0-2, pg. B-25:** The maximum MDL for Benzo(a)pyrene exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- d. **Table B-4.0-2, pg. B-26:** The maximum MDL for Bis(2-chloroethyl)ether exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- e. **Table B-4.0-2, pg. B-26:** The maximum MDL for Chloroaniline[4-] exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- f. **Table B-4.0-2, pg. B-26:** The maximum MDL for Dibenz(a,h)anthracene exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- g. **Table B-4.0-2, pg. B-26:** The maximum MDL for Dichlorobenzidine[3,3'-] exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- h. **Table B-4.0-2, pg. B-26:** The maximum MDL for Dinitro-2-methylphenol[4,6-] exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- i. **Table B-4.0-2, pg. B-26:** The maximum MDL for Dinitrotoluene[2,4-] exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- j. **Table B-4.0-2, pg. B-26:** The maximum MDL for Dinitrotoluene[2,6-] exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- k. **Table B-4.0-2, pg. B-26:** The maximum MDL for Diphenylhydrazine[1,2-] exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- l. **Table B-4.0-2, pg. B-27:** The maximum MDL for Hexachlorobenzene exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- m. **Table B-4.0-2, pg. B-27:** The maximum MDL for Hexachlorobutadiene exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- n. **Table B-4.0-2, pg. B-27:** The maximum MDL for Hexachloroethane exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.

- o. **Table B-4.0-2, pg. B-27:** The maximum MDL for Hexachlorobenzene exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- p. **Table B-4.0-2, pg. B-27:** The maximum MDL for Hexachlorobutadiene exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- q. **Table B-4.0-2, pg. B-27:** The maximum MDL for Indeno(1,2,3-cd)pyrene exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- r. **Table B-4.0-2, pg. B-27:** The maximum MDL for Nitrobenzene exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- s. **Table B-4.0-2, pg. B-27:** The maximum MDL for Nitrosodiethylamine[N-] exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- t. **Table B-4.0-2, pg. B-27:** The maximum MDL for Nitrosodimethylamine[N-] exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- u. **Table B-4.0-2, pg. B-27:** The maximum MDL for Nitroso-di-n-butylamine[N-] exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- v. **Table B-4.0-2, pg. B-27:** The maximum MDL for Nitroso-di-n-propylamine[N-] exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- w. **Table B-4.0-2, pg. B-27:** The maximum MDL for Nitrosopyrrolidine[N-] exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- x. **Table B-4.0-2, pg. B-27:** The maximum MDL for Pentachlorobenzene exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- y. **Table B-4.0-2, pg. B-27:** The maximum MDL for Pentachlorophenol exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- z. **Table B-4.0-2, pg. B-28:** The maximum MDL for Tetrachlorobenzene[1,2,4,5] exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.

**7. Table B-4.0-2, Analyte Method Detection Limits and Practical Quantitation Limits for Groundwater Samples Collected in Monitoring Years 2020 and 2021 and Analyzed by Accredited Contract Laboratories, pg. B-28-B-32.**

Several analytes in the volatile organic compounds (VOC) suite, utilizing analytical method SW-846:8260, have MDLs that exceed the screening value. Consider an alternative analytical method with a lower MDL for the VOCs listed below.

- a. **Table B-4.0-2, pg. B-28:** The maximum MDL for Acrolein exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- b. **Table B-4.0-2, pg. B-28:** The maximum MDL for Acrylonitrile exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- c. **Table B-4.0-2, pg. B-29:** The maximum MDL for Chloro-1,3-butadiene[2-] exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- d. **Table B-4.0-2, pg. B-29:** The maximum MDL for Dibromo-3-chloropropane[1,2-] exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- e. **Table B-4.0-2, pg. B-29:** The maximum MDL for Dibromoethane[1,2-] exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.
- f. **Table B-4.0-2, pg. B-29:** The maximum MDL for Dibromomethane exceeds the screening value.

Use another analytical method with an MDL below the screening value, if available.

g. **Table B-4.0-2, pg. B-30:** The maximum MDL for Trichloropropane[1,2,3-] exceeds the screening value. Use another analytical method with an MDL below the screening value, if available.

Please submit the revised Plan within 30 days of receipt of this letter that includes response to NMED comments provided in the letter. Should you have any questions regarding this correspondence, please contact Michael Petersen at (505) 690-5107.

Sincerely,

**Rick Shean** Digitally signed by Rick  
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File: LANL 2023, Approval with Modifications, Interim Facility-Wide Groundwater Monitoring Plan for the 2024 Monitoring Year, October 2023-September 2024  
LANL-23-054