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September 19, 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**  
**2023 ANNUAL PERIODIC MONITORING REPORT FOR THE TECHNICAL AREA 21**  
**MONITORING GROUP, LOS ALAMOS CANYON WATERSHED (FEBRUARY 2023)**  
**LOS ALAMOS NATIONAL LABORATORY**  
**EPA ID#NM0890010515**  
**HWB-LANL-23-011**

Dear Mr. Duran:

The New Mexico Environment Department (NMED) has received the United States Department of Energy's (DOE) *2023 Annual Periodic Monitoring Report for the Technical Area 21 Monitoring Group, Los Alamos Canyon Watershed* (Report), dated February 2023 and referenced by EM2023-0028. The Report was received by NMED on February 27, 2023.

NMED reviewed the Report and has the following comment:

- The sampling location LAOI-7 had a detection of filtered nickel at 288 µg/L, which exceeds the NMWQCC standard screening levels of 200 µg/L. Filtered nickel was also above the NMWQCC standard for the samples from the previous year, collected on 08/11/2021, with detections at 481 µg/L and 502 µg/L. This shows a two-year trend in elevated concentrations of nickel at location LAOI-7 and a discussion on this trend should be provided. The previous analytical results from the three years prior to the exceedances were 5.4 µg/L from the sample collected on 08/26/2020, 4.34 µg/L from the sample collected on 09/17/2019, and 4.01 µg/L from the sample collected on 09/17/2018.
- As stated in the Report, results for Low-Level Tritium were not reported in Table C.1 or in Table C.2 for locations LAOI(a)-1.1, R-5 S2, R-6, R-64, R-66, R-7 S3, R-8 S1, R-8 S2, R-9, R-9i S1, and TA-53i. Please provide data for Low-Level Tritium when it is available.
- The regional aquifer water table map presented in Figure 4.4-1 should include an explanation of the abnormal flow trends resulting from the impacts of the pumping associated with the injection and extraction from the hexavalent chromium plume interim remediation. The water table

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elevation lines should be limited to the Los Alamos Canyon Watershed and should not extrapolate into other canyons south of the monitoring locations.

- Clarification on the discussion and agreement made should be provided in Section 5.3, Sampling Program Modifications, where the Report states that NMED requested the frequencies for the analytical suites PCB and HEXP were reduced to quinquennially for locations R-9 S1, R-5 S2, R-7 S3, R-8 S1, and R-8 S2.

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 a response to NMED comments within 45 days of receipt of this letter.

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

Sincerely,

**Rick Shean** Digitally signed by  
Rick Shean  
Date: 2023.09.19  
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Rick Shean  
Designated Agency Manager  
Director, Resource Protection Division  
New Mexico Environment Department

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