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November 20, 2023

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

RE: REVIEW
2023 ANNUAL PERIODIC MONITORING REPORT FOR THE TECHNICAL AREA 54 MONITORING GROUP, PAJARITO CANYON AND MORTANDAD CANYON WATERSHEDS
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
LANL-23-061

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 54 Monitoring Group, Pajarito Canyon and Mortandad Canyon Watersheds* (Report), dated August 2023 and referenced by EM2023-0419. The Report was received by NMED on August 31, 2023.

NMED reviewed the Report and has the following comments:

- **Section 2.0, Scope of Activities:** Discussions include four wells which have been placed on the watch list because of water-quality and field-parameter data that indicate that the well does not produce representative samples. Both R-54 Screen 1 and R-55i are included on this list due to elevated iron and manganese, indicating locally reducing conditions due to residual drilling fluids. R-40 Si is included on the watch list and was excluded from reporting due to elevated iron and manganese without discussing the cause for the reducing conditions. Provide a more detailed discussion on the cause for the reducing conditions at R-40 Si. Discussions should also include any plans to rehabilitate the wells on the watch list for the collection of representative samples to fulfill the requirements under the Interim Facility-Wide Groundwater Monitoring Plan (IFGMP).
- **Section 2.1, Deviations from Planned Scope:** Deviations included monitoring wells which could not be sampled due to operational, logistical, or emergent issues. Specifically, R-23i screen 3 was not sampled due to ongoing pump issues and R-39 was not sampled due to electrical issues. R-40 Screen 1, R-40 Screen 2, and R-49 were all undergoing maintenance. Finally, R-51 Screen 2 couldn't not be sampled due to hazardous wind conditions and R-56 Screen 1 and 2 could not be

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sampled due to hazardous winter conditions. The discussion provided clarifies the current requirements of the IFGMP that state N3B will work to reestablish access within the 21-day sampling period. If access cannot be reestablished during the 21-day period, the location is skipped for that sampling event. In the instances where monitoring wells are sampled on an annual basis, the inability to reestablish access during the 21-day sampling campaign prevents the collection of samples in monitoring wells for the entire monitoring year. Provide a discussion on the due diligence actions taken to attempt to reestablish access for sampling during the sampling campaign. A discussion should be provided for all wells undergoing maintenance or experiencing infrastructure issues, which prevented the collection of samples during the monitoring year, that addresses the actions planned by N3B to prevent the reoccurrence of these data gaps in future monitoring reports.

- **Table 4.2-1, Target Analytes with MDLs Equal to or Above Screening Values:** This table lists the analytes that have method detection limits that exceed the screening levels, groundwater standard, or maximum contaminant levels. Alternative analytical methods must be evaluated to determine the ability to implement a method that would result in method detection limits below the required standards.
- **Table 4.2-2, Target Analytes with MDL Values that Range Above and Below Screening Values:** Alternative analytical methods must be evaluated to determine the ability to implement a method that would result in the range of method detection limits occurring below the required standards.

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 Kylian Robinson at (505) 231-5423.

Sincerely,

**Rick
Shean**

Rick Shean

Designated Agency Manager, Hazardous Waste Bureau
Director, Resource Protection Division, NMED

Digitally signed
by Rick Shean
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