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November 21, 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 LONG-TERM MONITORING AND MAINTENANCE REPORT FOR THE CORRECTIVE MEASURES IMPLEMENTATION AT FORMER 260 OUTFALL AREA
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
LANL-23-073

Dear Mr. Duran:

The New Mexico Environment Department (NMED) has received the United States Department of Energy's (DOE) *2023 Annual Long-Term Monitoring and Maintenance Report for the Corrective Measures Implementation at Former 260 Outfall Area* (Report), dated September 2023 and referenced by EM2023-0581. The Report was received by NMED on September 29, 2023.

NMED reviewed the Report and has the following comments:

- Low-Level Tritium results were not provided for the monitoring locations Burning Ground Spring and Martin Spring, following the requirements of the Long-Term Monitoring and Maintenance Plan. Provide the Low-Level Tritium data when the analysis is received or provide a response stating the deviation.
- The analytical results for $^{15}\text{N}/^{18}\text{O}$ Isotopes in Nitrate were not provided for monitoring locations Burning Ground Spring, Bulldog Spring, and Martin Spring, following the requirements of the Long-Term Monitoring and Maintenance Plan. Provide the $^{15}\text{N}/^{18}\text{O}$ results or provide a response stating the deviation.
- The analytical results were not provided for the semiannual sampling collected on March 20, 2023 at monitoring location CdV-16-611937. The comment provided on Table 2.1-1, *Long-Term Monitoring and Maintenance Plan Sampling Program Field Parameters*, states that a prioritized suite [was] collected because of limited available water. Provide the analytical results for the semiannual sampling collected on March 20, 2023 or provide a response stating the deviation.
- There is inconsistency between Table 2.1-1, *Long-Term Monitoring and Maintenance Plan*

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Sampling Program Field Parameters, and Table 2.2-5, *RDX Concentrations in Groundwater, Surface Water, and Springs*, for the sampling location Water at Beta on the August 17, 2022 sampling date. Table 2.1-1 states that the sample collection was canceled because the area was inaccessible due to a downed tree in the road and Table 2.2-5 states that the sample collection was canceled because the site was dry. Correct the inconsistency. NMED notes that due diligence to correct the cause of the deviation must occur during the sampling period, when possible, to prioritize the collection of samples required by the Long-Term Monitoring and Maintenance Plan.

- There is inconsistency between Table 2.1-1, *Long-Term Monitoring and Maintenance Plan Sampling Program Field Parameters*, and Table 2.2-5, *RDX Concentrations in Groundwater, Surface Water, and Springs*, for the sampling location SWSC Spring on the March 28, 2023 sampling date. Table 2.1-1 states that the sample collection was canceled because the site was dry and Table 2.2-5 states that the sample collection was canceled because the site was frozen. Correct the inconsistency. NMED notes that due diligence to correct the cause of the deviation must occur during the sampling period, when possible, to prioritize the collection of samples required by the Long-Term Monitoring and Maintenance Plan.
- Appendix A, *Field Forms Associated with Sample Collection*, include monitoring wells that are not associated with this Report. Additionally, the field notes provided should be organized by date to facilitate easier review.

NMED notes that this review is based on the information presented in the Report and this does not constitute approval 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

Digitally signed by
Rick Shean
Date: 2023.11.21
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Rick Shean
Designated Agency Manager, Hazardous Waste Bureau
Director, Resource Protection Division, NMED

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