



Certified Mail- Return Receipt Requested

February 2, 2024

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 GENERAL SURVEILLANCE
MONITORING GROUP: LOS ALAMOS AND PUEBLO CANYON, MORTANDAD AND SANDIA
CANYON, WATER CANYON/CANON DE VALLE, ANCHO CANYON, WHITE ROCK CANYON, AND
PAJARITO CANYON WATERSHEDS
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-23-081

Dear Mr. Duran:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) *2023 Annual Periodic Monitoring Report for the General Surveillance Monitoring Group: Los Alamos and Pueblo Canyon, Mortandad and Sandia Canyon, Water Canyon/Cañon de Valle, Ancho Canyon, White Rock Canyon, and Pajarito Canyon Watersheds* (Report), dated November 30, 2023, and received on December 1, 2023, and referenced by EM2023-0749.

NMED notes that in monitoring year (MY) 2023, DOE was only able to collect a total of 45 samples out of the 57 samples attempted for the general surveillance monitoring group. Twelve samples were not collected, and of those, six samples were not collected due to the site being dry or the wells not having sufficient water to sample. NMED also notes that the monitoring location Spring 4 had analytical detections of Dibenz(a,h)anthracene at 0.355 µg/L and 0.336 µg/L for, which are both 10x greater than the NMED Tap screening level of 0.0343 µg/L.

NMED has completed its review and has the following comments:

1. Table 2.1-2, General Surveillance Monitoring Group PME Deviations, page 34.

NMED Comment: DOE has provided sufficient rationale for not sampling monitoring locations Spring 4A, DP Spring, and TW-2Ar, but did not provide adequate information on the actions taken to correct the issues preventing the collection of the required samples. For example, DP

Spring was not sampled with the comment stating “Area inaccessible due to spring being covered by cliff erosion debris” but it does not clarify if the erosion debris have subsequently been removed to improve accessibility for the next sampling event. Revise Table 2.1-2 to clarify if the issue preventing sample collection has been corrected, similarly to the description provided for R-19 S3.

2. Table 4.2-1, Target Analytes with MDLs Equal to or Above Screening Values, page 36.

NMED Comment: Several target analytes continue to have method detection limits (MDLs) above screening levels. DOE must evaluate implementing another analytical method(s) with an MDL lower than the appropriate screening levels, if available, for the following constituents as part of revision in the MY2025 Interim Facility-Wide Groundwater Monitoring Plan: Benzidine, Benzo(a)anthracene, Benzo(a)pyrene, Bis(2-chloroethyl)ether, Chloraniline[4-], Dibenz(a,h,)anthracene, Dinitro-2-methylphenol[4,6-], Dinitrotoluene [2,4-], Dinitrotoluene[2,6], Hexachlorobenzene, Hexachlorobutadiene, Hexachloroethane, Nitrobenzene, Nitroso-di-n-butylamine[N-], Pentachlorobenzene, Pentachlorophenol, Tetrachlorobenzene[1,2,4,5], Acrolein, Acrylonitrile, Chloro-1,3-butadiene[2-], Dibromoethane[1,2-], Trichloropropane[1,2,3-].

Provide a replacement table and response to comments to NMED within 60 days of receipt of this letter.

If you have any questions regarding this letter, please contact Siona Briley at (505) 690-5160.

Sincerely,

**Rick
Shean**

Rick Shean

Designated Agency Manager

Director, Resource Protection Division

New Mexico Environment Department

Digitally signed by
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File: 2024 LANL General, Review 2023 Annual Periodic Monitoring Report for the General Surveillance Monitoring Group: Los Alamos and Pueblo Canyon, Mortandad and Sandia Canyon,

Water Canyon/Cañon de Valle, Ancho Canyon, White Rock Canyon, and Pajarito Canyon
Watersheds

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