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John Kieling, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

**Subject: Response to Review of the Periodic Monitoring Report for Technical Area 54
Monitoring Group, First Quarter, Monitoring Year 2016**

Dear Mr. Kieling:

The New Mexico Environment Department (NMED) provided comments on October 14, 2016, on the Periodic Monitoring Report for Technical Area 54 Monitoring Group, First Quarter, Monitoring Year 2016, submitted in May 2016 by the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (collectively, the Permittees). To facilitate review of the Permittees's responses, NMED's comments are included verbatim, followed by the Permittees's responses.

NMED Comments:

Appendix B, Page B-49:

Transducer (continuous) and manual groundwater level data were not reported for R-20 S2 from May 12, 2015 through October 26, 2015. The groundwater sampling event occurred on October 26, 2015.

Appendix B, Page B-93:

The only reported groundwater level data for this monitoring period from R-23i S2 was a manual measurement taken on September 3, 2015. No groundwater level measurement was reported for the October 26, 2015 groundwater sampling event.

Appendix B, Page B-338:

From April 10, 2015, through October 21, 2015, only three groundwater level measurements were reported from R-52 S2. These groundwater level measurements were manual measurements collected on June 2, 2015, June 17, 2015, and September 4, 2015. No groundwater level measurement was reported for the October 21, 2015, groundwater sampling event.

Appendix B, Page B-482:

Transducer (continuous) and manual groundwater level data were not reported for R-56 S2 from April 3, 2015, through April 19, 2015.

Appendix B, Page B-512:

Transducer (continuous) and manual groundwater level data were not reported for R-57 S2 from April 16, 2015, through June 30, 2015.

Continuous and manual groundwater level measurements are described in the approved MY2016 Interim Facility-Wide Groundwater Monitoring Plan. In the future, provide complete continuous and manual groundwater level data in the Report, including the water level measurement on the groundwater sampling date, or discuss the gaps in reporting of the groundwater level data.

LANL Response:

Los Alamos National Laboratory (the Laboratory) recognizes that measuring the groundwater level before purging and sampling a monitoring location is a requirement of the Compliance Order on Consent. The Interim Facility-Wide Groundwater Monitoring Plan for Monitoring Year 2017 was prepared to comply with this requirement, and all future periodic monitoring reports (PMRs) will note any instances when a groundwater level measurement was not obtained before purging and sampling.

In addition to collecting groundwater level data before purging and sampling, the Laboratory collects groundwater level data “continuously” (e.g., hourly, daily) for most monitoring locations, and these data are voluntarily provided in PMRs. Any gaps in the continuous groundwater level records presented in the PMRs are a result of one or more of the following reasons:

- Dry well
- Water level falls below level monitoring pressure transducer
- Well not equipped with a level transducer
- Level transducer not functioning properly (including failure)
- Transducer temporarily removed from well for maintenance and/or calibration

Section 3.3, Groundwater Elevations and Base Flow Observations, of future PMRs will include the above reasons for any gaps in continuous groundwater level data.

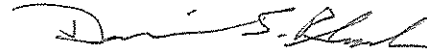
If you have any questions, please contact Steve Paris at (505) 606-0915 (smparis@lanl.gov) or Hai Shen at (505) 665-5046 (hai.shen@em.doe.gov).

Sincerely,



Bruce Robinson, Program Director
Environmental Remediation Program
Los Alamos National Laboratory

Sincerely,



David S. Rhodes, Director
Office of Quality and Regulatory Compliance
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