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AUG 2011
NMED Hazardous
Waste Bureau

National Nuclear Security Administration
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Environmental Restoration Program
Los Alamos, New Mexico 87544
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Date: AUG 15 2011
Refer To: EP2011-0156

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

Subject: Submittal of the 2011 Interim Facility-Wide Groundwater Monitoring Plan

Dear Mr. Kieling:

Enclosed please find two hard copies with electronic files of the 2011 Interim Facility-Wide Groundwater Monitoring Plan (the Interim Plan). Los Alamos National Laboratory (the Laboratory) also respectfully submits responses to the New Mexico Environmental Department's (NMED's) Approval with Modification for the 2010 Interim Facility-Wide Groundwater Monitoring Plan, Los Alamos National Laboratory, EPA ID No. NM0890010515, HWB-LANL-10-048, dated March 25, 2011.

The 2011 Interim Plan incorporates several major changes from the 2010 Interim Plan, reflecting modifications stipulated by NMED:

- The water-monitoring year has been redefined as the period from October 1, 2011, to September 30, 2012. In the past, the water-monitoring year was the period from July 1 to June 30.
- The monitoring plan is organized by area-specific monitoring groups (related to project areas) rather than by watershed. Area-specific monitoring groups are defined for Technical Area 54 (TA-54), TA-21, Material Disposal Area (MDA) AB, MDA C, the chromium investigation area, and the TA-16 260 Outfall. Locations not included in these six area-specific monitoring groups are assigned to a general surveillance monitoring group.
- The Interim Plan has discontinued the use of the Well Screen Analysis Report, Revision 2, and proposes an approach to use trends in water-quality data to evaluate the representativeness of water quality.

Under separate cover, the Laboratory will be submitting a request to modify the March 2005 Compliance Order on Consent (Consent Order) and is proposing language changes to Sections IV.A, IV.B, and XI.D. These changes will provide an alternative to watershed-based interim and long-term groundwater monitoring. The Laboratory's proposed modification to the Consent Order would allow for area-specific groundwater monitoring approach in place of watershed-based monitoring.

With NMED's concurrence, the Laboratory plans to implement the monitoring approach herein effective October 1, 2011. We welcome early communications on the Interim Plan with NMED. 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@nnsa.doe.gov).

Sincerely,

Michael J. Graham, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,

George J. Rael, Assistant Manager
Environmental Projects Office
Los Alamos Site Office

MG/GR/CD/SP/TG:sm

Enclosures: Two hard copies with electronic files:
(1) Response to the Approval with Modification for the 2010 Interim Facility-Wide Groundwater Monitoring Plan Los Alamos National Laboratory (LA-UR-11-4671)
(2) 2011 Interim Facility-Wide Groundwater Monitoring Plan (LA-UR-11-2183)

Cy: (w/enc.)
Neil Weber, San Ildefonso Pueblo
Hai Shen, DOE-LASO, MS A316
Ed Worth, DOE-LASO, MS A316
Steve Paris, EP-CAP, MS M992
RPF, MS M707 (electronic copy)
Public Reading Room, MS M992 (hard copy)

Cy: (Letter and CD and/or DVD)
Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-DOE-OB, MS M894
Tim Goering, EP-ET, MS M992 (w/ MS Word files on CD)
William Alexander, EP-BPS, MS M992

Cy: (w/o enc.)
Tom Skibitski, NMED-OB, Santa Fe, NM (date-stamped letter emailed)
Annette Russell, DOE-LASO (date-stamped letter emailed)
Craig Douglass, EP-CAP, MS M992 (date-stamped letter emailed)
Michael J. Graham, ADEP, MS M991 (date-stamped letter emailed)