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MAR 2013
NMED Hazardous Waste Bureau

National Nuclear Security Administration
Los Alamos Field Office, MS A316
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Los Alamos, New Mexico 87544
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Date: MAR 28 2013
Refer To: EP2013-0054

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 Material Disposal Area AB Monitoring Group, February 1–February 3, 2012

Dear Mr. Kieling:

The New Mexico Environment Department (NMED) provided a comment on February 25, 2013, on the Periodic Monitoring Report for Material Disposal Area AB Monitoring Group, February 1–February 3, 2012, submitted in August 2012 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 response, NMED's comment is included verbatim, followed by the Permittees's response.

NMED Comment:

Upon review of the data provided in Appendix C, the reported result for arsenic for regional aquifer well R-30, sampled on February 1, 2012 did not match the laboratory report in Appendix F. Review all reported data for accuracy and provide replacement pages for errors in tables. This review and subsequent correction must include data reported in the Intellus database. Provide the replacement tables no later than April 5, 2013.

LANL Response:

The data table in Appendix C is prepared using data extracted from EIM, Los Alamos National Laboratory's (LANL's) analytical database, which reports the practical quantitation limits (PQLs) for results of nondetected analytes. The laboratory report provided in Appendix F presents the method detection limits (MDLs), not the PQLs, for results of nondetected analytes. This discrepancy is limited to metals results for the water medium analyzed by a single contract laboratory.

NMED's comment also required LANL to review the data reported in the Intellus database. The results in Intellus are consistent with the results in EIM and in the data table in Appendix C of the subject PMR.

LANL prefers not to request that the contract laboratory amend previously submitted reports. For future reporting, however, LANL has directed the laboratory to revise its reporting format to present the PQL values for the results of nondetected analytes. Therefore, although the contract laboratory's report is currently not consistent with the PMR data table, the table presents accurate data. In the future, when the contract laboratory provides the PQL for results of nondetected analytes, the results reported in Appendixes C and F will be consistent.

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,

Jeff Mousseau, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,

Peter Maggiore, Assistant Manager
Environmental Projects Office
Los Alamos Field Office

JM/PM/CD/SP:vt

Cy: Hai Shen, DOE-NA-00-LA (date-stamped letter emailed)
Cheryl Rodriguez, DOE-LASO (date-stamped letter emailed)
Steve Paris, EP-CAP (date-stamped letter emailed)
Jerry Schoeppner, NMED-GWQB (date-stamped letter emailed)
Jerzy Kulis, NMED-HWB (date-stamped letter emailed)
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