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NMED Hazardous Waste Bureau

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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, October 9–October 25, 2012, Los Alamos National Laboratory

Dear Mr. Kieling:

The New Mexico Environment Department (NMED) provided a comment on August 28, 2013, on the Periodic Monitoring Report for Technical Area 54 Monitoring Group, October 9–October 25, 2012, submitted in February 2013 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:

NMED noted an inconsistency in the Chloroform value reported for sample number CAPA-12-23794 in Table C (1.5 µg/L) and in the analytical laboratory's report provided in Attachment F (0.83 µg/L). The Permittees must correct this inconsistency in all future periodic monitoring reports and within the INTELLUS database.

LANL Response:

The table in Appendix C, titled TA-54 Monitoring Group Analytical Results and Results from the Four Previous Monitoring Events if Available, provides two chloroform results for sample CAPA-12-23794 at location 03-B-13 on October 23, 2012. The first result is for the dilution (DL), and the second is for the initial analysis (INIT). The initial analysis result for chloroform is reported as 0.830 µg/L, with a "J" qualifier, and the dilution (DL) result is reported as 1.5 µg/L, the value for the method detection limit (MDL), with a "U" qualifier. Appendix F, Analytical Reports, file 2013-208-L2.pdf, provides the laboratory reports for sample CAPA-12-23794. The first data package is identified as CAPA-12-23794 and reports a value of 0.830 µg /L with a "J" qualifier an MDL/limit of detection (LOD) of 0.300 µg /L, and a practical quantitation limit (PQL)/limit of quantitation (LOQ) of 1.00 µg/L. The second data package is identified as CAPA-12-23794DL and reports a value of 5.00 µg/L with a "U" qualifier, an MDL/LOD of 1.50 µg/L, and a PQL/LOQ of 5.00 µg/L.

As noted in a letter from the Permittees to NMED, dated March 28, 2013 (EP2013-0054), LANS directed the analytical laboratory to revise its reporting format to present the PQL values for the results of nondetected analytes rather than the MDL. The data packages in Appendix F are consistent with this direction, which is the reason the nondetect dilution result is reported as 5.00 µg/L, the value for the PQL.

Although the results in Appendix C for the "U"-qualified diluted sample reports the MDL value, this report predates the decision to report the PQL for nondetects in periodic monitoring reports (PMRs). However, all analytical reports included in recent submittals of PMRs adhere to this requirement. The nondetected results reported in Appendix F for the diluted sample is correctly reported in Intellus as the PQL. Therefore, no changes to the Intellus database are necessary.

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
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