Response to the Review of Periodic Monitoring Reports for Pajarito Watershed, August 31–September 17, 2009, December 1–December 17, 2009, and February 22–March 12, 2010, Los Alamos National Laboratory EPA ID #NM0890010515, HWB-LANL-I0-018, HWB-LANL-I0-037, and HWB-LANL-I0-065, Dated September 23, 2010

INTRODUCTION

To facilitate review of this response, the New Mexico Environment Department's (NMED's) comments are included verbatim. Los Alamos National Laboratory's (LANL's or the Laboratory's) responses follow each NMED comment.

COMMENTS FOR THE AUGUST 31–SEPTEMBER 17, 2009, REPORT

NMED Comment

1. *The third sentence of the first paragraph in Section 4.2 on page 3 states, "The screening levels with which the results are compared are shown in Table 4.2-1." A single sentence on page 4 states, "The screening levels applied to all media and their sources are listed in Table 4.2-1. However, Table 4.2-1 lists the sources of the screening levels, not the actual screening levels. For clarification in future reports, the statements cited above must be revised to state that the Table lists the source of screening levels.*

LANL Response

1. Beginning with the November 2010 periodic monitoring report submittal, this sentence will read "The sources of screening levels with which the results are compared are listed in Table 4.2-1."

NMED Comment

2. *The cause for no data reported for location R-19, Screens 5-7 was "Samples cancelled by Tim Goering on 09/18/2009." The Permittees must provide an explanation for cancelling sample collection or analyses in future reports.*

LANL Response

2. All planned samples were collected during the watershed monitoring event and reported in the periodic monitoring report for location R-19, screens 5, 6, and 7. The 2009 Interim Facility-Wide Groundwater Monitoring Plan (LANL 2009, 106115) scheduled only an indicator suite for these screens. Field notes indicated that the samples for screen 6 were cancelled, and this information carried over to the periodic monitoring report. However, this cancellation applied to a documentation error that called for additional (unplanned) samples.

   LANL will provide an explanation for cancelling sample collection or analyses in future reports.

COMMENT FOR THE AUGUST 31–SEPTEMBER 17, 2009, AND DECEMBER 1–DECEMBER 17, 2009, REPORTS

NMED Comment

3. *The Permittees reported, in Tables 2.0-1 and 3.4-1, that two Base Flow locations were not sampled because they were dry; Pajarito above Two Mile (PBF-4) and Two Mile above Pajarito (PBF-3). The names of these two locations likely correspond to two Base Flow locations listed in the Interim Facility-Wide Groundwater Monitoring Plan (IFGMP); Pajarito above Two Mile (E-243) and Two Mile above Pajarito (E-244), respectively. The Permittees must ensure that location or sampling station names in reports are consistent with the IFGMP.*

LANL Response

3. For the first of these reports, the locations listed in Table 2.0-1 as Pajarito above Two Mile (PBF-4) and Two Mile above Pajarito (PBF-3) were shown on figure 2.0-1 as PBF-3 and PBF-4. These names were modified on Table 2.0-1 to provide correspondence with map locations.

   LANL will provide consistent location names in future versions of the Interim Facility-Wide Groundwater Monitoring Plan and periodic monitoring reports.

COMMENT FOR THE DECEMBER 1–DECEMBER 17, 2009, REPORT

NMED Comment

4. *NMED noted that the concentration of silicon dioxide in the groundwater sample collected in R-21 at Port 1761 was 71,100 mg/L. This concentration is 1000X concentrations detected in the three previous sampling events. This may be an error in the reported unit of measure. However, the Permittees did not discuss it as being inconsistent with data reported from previous monitoring events in this watershed. The Permittee must identify all data that are not consistent with data reported from previous monitoring events in future reports.*

LANL Response

4. The silica concentration for R-21 on 12/4/09 was reported incorrectly by the analytical laboratory. The error has been corrected by the analytical laboratory, and future reports will reflect this change. The correct result is 71.1 mg/L.

COMMENT FOR THE FEBRUARY 22–MARCH 12, 2010, REPORT

NMED Comment

5. *According to Table 2.0-1 the cause for no data reported for location 3MAO-2 was "cancelled by project lead." However, according to Table 3.4-1 the location was not sampled because it was dry. The Permittees must provide consistent reasons for not sampling a location. Further, if the reason for not sampling a location is due to it being cancelled the Permittee must provide an explanation for cancelling sample collection or analyses in future reports.*

LANL Response

5. Sampling of 3MAO-2 was cancelled because it was dry as indicated in Table 3.4-1. LANL will provide consistent reasons for cancelling sample collection in future reports.

REFERENCE

LANL (Los Alamos National Laboratory), May 2009. "2009 Interim Facility-Wide Groundwater Monitoring Plan," Los Alamos National Laboratory document LA-UR-09-1340, Los Alamos, New Mexico. (LANL 2009, 106115)