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LANL General

November 12, 1996

Mat Johansen, DOE AIP POC
U. S. Department of Energy
Los Alamos Area Office, MS A316
Los Alamos, NM 87544

Subject: **LANL Environmental Restoration Project list of contaminants of potential ecological concern (COPECs) for screening**

Dear Mr. Johansen:

The DOE Oversight Bureau (DOB) has reviewed the subject document. Our comments are provided below. These comments are not provided or intended for the purpose of representing the regulatory position of the New Mexico Environment Department (NMED).

Contrary to what was indicated in the minutes of the monthly (October 23) meeting with HRMB, the DOE Oversight Bureau will continue to transmit technical recommendations directly to DOE site offices and facility operators.

In an October 9, 1996, letter to Benito Garcia, LANL provided a "Core COPEC List for Screening". Discussion at the October 23 meeting concluded that the core list (1) is a starting point for the purpose of obtaining toxicity data, (2) can be further refined as the eco-risk process continues (3) is primarily for terrestrial systems and that water quality standards as well as toxicity data will be considered when assessing impacts to aquatic systems, and (4) may be modified as receptor and/or site specific information is developed.

AIP comments resulting from the meeting and subsequent discussions are as follows:

Soils

Volatile organic carbon breakdown products should be considered. Besides specific radioactive COPECs, gross alpha, beta, and gamma should be added as indicators of the presence of radioactive daughter products.

Water

As more water data are generated, a list of COPECs for aquatics alone should be developed with input from stakeholders in other agencies, tribal governments, etc. Water quality standards as well as toxicity data should be considered when assessing impacts to aquatic systems. COPECs for aquatic systems should incorporate acute and chronic fishery standards as well as livestock watering and wildlife habitat standards. Drinking water standards (MCLs) should be considered when developing COPECs for aquatic systems. Both dissolved and suspended fractions in surface water should be evaluated as transport pathways. Nitrates and phosphorous should be added. Radionuclides should be added as appropriate.

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Mat Johansen
COPECs for Screening
November 5, 1996

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If there are any questions, please contact me at (505)827-1536.


Sincerely,

Tim Michael
DOE Oversight Bureau Technical Support Staff

TM:tm

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