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June 2, 1997

David W. Neleigh  
Chief, New Mexico - Federal  
Facilities Section  
U.S. EPA Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

SUBJECT: EPA Region 6 Letter of October 11, 1995 to Mr. Theodore J. Taylor DOE Program Manager

Dear Mr. Neleigh:

The New Mexico Environment Department Hazardous and Radioactive Materials Bureau has recently reviewed the EPA Region 6 comments pertaining to the ecological risk assessment methodology developed by Los Alamos National Laboratory and found that one of the statements incorporated into the EPA Region 6 letter of October 11, 1995 to Mr. Theodore J. Taylor DOE Program Manager requires clarification. The letter outlines a procedure recommended for the screening risk assessment at Los Alamos and states the following:

" Chemicals of potential concern can be screened out using the upper tolerance limit (UTL) procedure accepted for human risk assessments at Los Alamos. The risk due to background contaminants must be calculated and presented in the final report"

Our understanding of the screening risk assessment process appears to be different since we are not aware of any UTL procedure being accepted as a screening tool or criterion for human risk assessment at Los Alamos. Please clarify these issues.

Thank you for your cooperation in this matter.

Sincerely,

Robert "Stu" Dinwiddie, RCRA Permits Program Manager  
Hazardous and Radioactive Materials Bureau

cc: Teri Davis, HRMB/NMED  
Maria Martinez, EPA/Region 6  
Jeff Yurk, EPA/Region 6

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General



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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OCT 11 1995

Ron K. — RAK  
Bartora —

Tew —  
Susa —

FILE

Mr. Theodore J. Taylor  
Program Manager  
Department of Energy  
Los Alamos Area Office  
Los Alamos, NM 87544

Dear Mr. Taylor:

The Environmental Protection Agency (EPA) has reviewed the document entitled Draft Ecotoxicological Screening Methodology for Los Alamos National Laboratory. Enclosed is the outline of a procedure which should be considered for the screening risk assessment at Los Alamos. In addition, the method proposed should be revised to address the following concerns.

- 1) It is acceptable to divide up the facility into ecological habitats which may contain or be effected by contamination of more than one SWMU instead of dealing with SWMU's on an individual basis. The initial habitat pre-screening proposed is appropriate if used properly, i.e. it answers the following three questions:
  - A. Is a contaminant present?;
  - B. Is a receptor present?; and,
  - C. Can the receptor be exposed to the contaminant for a sufficient time to cause an effect?
- 2) Chemicals of potential concern can be screened out using the UTL procedure accepted for human risk assessments at Los Alamos. The risk due to background contaminants must be calculated and presented in the final report.
- 3) The ESAL screening procedure presented does not appear to be appropriate. Uncertainty associated with the approach seems far too variable to be used. The full reference for the citation Ebinger et al. 1994 should be provided.

Should you have any questions, please contact Barbara Driscoll at (214) 665-7441 or Jeff Yurk at (214) 665-8309.

Sincerely,

  
David W. Neleigh, Chief  
New Mexico - Federal  
Facilities Section

Enclosure

cc: Mr. Benito Garcia  
New Mexico Environment Department  
Mr. Jorg Jansen  
Los Alamos National Laboratory, MS M992