

General



Los Alamos National Laboratory/University of California
Environmental Stewardship (ENV)
Environmental Remediation and Surveillance (ERS), MS M992
Los Alamos, New Mexico 87545
(505) 667-0469/FAX (505) 665-4747

National Nuclear Security Administration
Los Alamos Site Operations, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544
(505) 667-7203/FAX (505) 665-4504



Date: December 7, 2005
Refer To: ER2005-0915

Mr. James Bearzi
NMED – Hazardous Waste Bureau
2905 Rodeo Park Drive East
Building 1
Santa Fe, NM 87505-6303

SUBJECT: REVISION 3.0 OF THE NEW MEXICO ENVIRONMENT DEPARTMENT SOIL SCREENING LEVELS

Dear Mr. Bearzi:

The Environmental Stewardship–Environmental Remediation and Surveillance (ENV-ERS) Program has recently become aware of a revision to the New Mexico Environment Department’s (NMED’s) “Technical Background Document for Development of Soil Screening Levels, Revision 3.0,” dated August 2005. A comparison of the soil screening levels (SSLs) in Revision 3.0 with those in Revision 2.0 (February 2004) indicates that many values have changed.

Because there was no opportunity to review and comment on the revision as in previous years, the changes to the SSLs in this latest version raise several questions. The table of toxicity values in Appendix C is missing from Revision 3.0; the table provided in Appendix C is a duplicate of the SSL table in Appendix A. Also, a large number of changes to the SSLs are not transparent. Some of these changes are apparently related to changes in the chemical/physical parameters in Table B-1, such as soil-water partition coefficients and diffusivity, but others are not. These other changes include increases or decreases of the SSLs by a factor of two or more as well as the use of saturation values for several analytes that are not volatile organic chemicals and that were not handled as such in previous versions of this document. Because exposure parameters did not change from Revision 2.0, the logic behind these changes is not clear. The program is concerned with the accuracy and documentation of the values put forth in the latest revision because NMED’s SSLs are the basis for the human health assessments conducted and are used for site decision-making.

The ENV-ERS Program would like the opportunity to review and discuss the changes to the SSLs with NMED to better understand the basis for the revised values or we would like to request a copy of the table of toxicity values and the calculation spreadsheets used for Revision 3.0.



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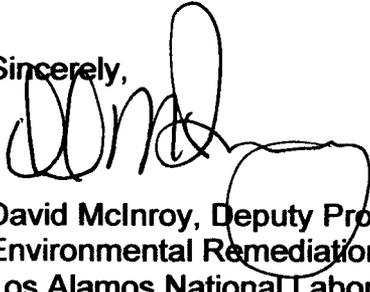
Mr. James Bearzi
ER2005-0915

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Please let us know when we can discuss the latest SSL document and if you are able to provide the necessary information and data to clarify the changes to the SSLs.

Sincerely,



David McInroy, Deputy Program Director
Environmental Remediation and Surveillance
Los Alamos National Laboratory

Sincerely,



David Gregory, Project Manager
Department of Energy
Los Alamos Site Office

DM/DG/jr

Cy:

P. Reneau, ENV-ECR, MS M992
ENV-ECR File, MS M992
RPF, MS M707
A. Dorries, ENV-ECR, MS M992
R. Mirenda, ENV-ECR, MS M992
B. Criswell, ENV-ERS, MS M992
J. Dewart, ENV-ERS, MS M992
G. Lopez Escobedo, ENV-ERS, MS M992
D. McInroy, ENV-ERS, MS M992
D. Gregory, DOE LASO, MS A316
IM-9, MS A150