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Mr. David Cobrain  
Hazardous Waste Bureau  
2905 Rodeo Park Dr. E/Bldg 1  
Santa Fe, NM 87505

RE: Draft Technical Review Comments on the Ecorisk Database Release 2.3, October 2008,  
Los Alamos National Laboratory, New Mexico

Dear Mr. Cobrain:

This letter serves as a deliverable and includes a discussion of the review of Los Alamos National Laboratory's (LANL) Ecorisk Database Release 2.3 Release (October 2008).

When conducting ecological screening/risk assessments in support of site investigations, corrective measures, and/or closures, LANL relies upon the Ecorisk database as the only source for toxicity reference values (TRVs) for ecological receptors. The concern in the past with this practice has been that constituents are often eliminated from an assessment if the constituent is not included in the database, regardless of whether sufficient toxicological data are available to assess potential risk. In reviewing this latest release of the database, it is noted that several constituents have been added; however, there are several constituents of potential ecological concern (COPECs) identified at LANL that are not in the database.

As an example, a review was performed on the previously drafted technical review comments for the *Pueblo Canyon Aggregate Investigation Report* dated March 2008 (technical comments dated May 29, 2008). As noted in Specific Comment number 8, several constituents had been excluded from the ecological assessment that had sufficient toxicological data. 4,4-DDD and aldrin were among those excluded from the assessment. The Release 2.3 of Ecorisk has since been revised to include these two constituents; although, several others are still not currently addressed in Ecorisk, i.e. nitrate/nitrogen, ethylbenzene, isopropylbenzene, styrene, and endosulfan sulfate.

It is strongly suggested that LANL conduct a review of all areas under investigation to determine a master list of COPECs. The Ecorisk database should be updated to address and include appropriate TRVs for each COPEC present at LANL. While this work is being conducted, it is also strongly suggested that a caveat be added to the database indicating that the database is not all inclusive of constituents that may be identified as a COPEC at a site. Exclusion of a constituent in the Ecorisk database is not sufficient justification for deleting a constituent from

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quantitative risk analysis. In the event that the Ecorisk database does not include a TRV for a specific constituent, additional review of literature should be conducted to determine an appropriate TRV. If a review of literature does not result in appropriate toxicological data, only then may a constituent be eliminated from the quantitative assessment and may be addressed qualitatively in the uncertainties section of the risk assessment.

If you or any of your staff have questions, please contact me at (801) 451-2864 or via email at paigewalton@msn.com.

Thank you,



Paige Walton

AQS Senior Scientist and Project Lead

cc: Neelam Dhawan, NMED (electronic)  
Joel Workman, AQS (electronic)