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560 Golden Ridge Road, Suite 130
Golden, CO 80401
(303) 763-7188
(303) 763-8889 FAX
www.techlawinc.com

December 15, 2005

Mr. David Cobrain
State of New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East
Building One
Santa Fe, New Mexico 87505-6303



Reference: Work Assignment No. 06110.290.0002; State of New Mexico Environment Department, Santa Fe, New Mexico; Human Health and Ecological Risk Assessment Support; Review of the Response to Comments to the Secondary Notice of Deficiency for the "Completion Report for the Voluntary Corrective Action at SWMUs 0-030(a), 0-030(b)-00, and 0-033(a) and AOCs 0-029(a,b,c) and 0-010(a,b) and for the IA at SWMU 21-021-99, Los Alamos National Laboratory, New Mexico, Task 2 Deliverable.

Dear Mr. Cobrain:

This letter serves as a deliverable for the above-referenced work assignment. This letter addresses the evaluation of the "Response to Comments to the Secondary Notice of Deficiency for the "Completion Report for the Voluntary Corrective Action at SWMUs [Solid Waste Management Units] 0-030(a), 0-030(b)-00, and 0-033(a) and AOCs [Areas of Concern] 0-029(a,b,c) and 0-010(a,b) and for the IA [Interim Action] at SWMU 21-021-99," Los Alamos National Laboratory, New Mexico.

As discussed with Ms. Darlene Goering, the intent of this risk assessment was to add the assessment of the 6th Street Warehouse Areas of Concern (AOCs) and Solid Waste Management Units (SWMUs) that had been excluded from previous site analysis. The reason for the exclusion was that this area had been addressed under the DP Road Voluntary Cleanup Action (VCA) completion report. However, in order to close the site in its entirety, the 6th Street Warehouse areas had to be addressed on a site-wide basis. Because of the above, it was agreed that the use of the 2003 Screening Action Levels (SALs) and ecological screening levels (ESLs) was appropriate.

The responses to the comments were adequate as provided. However, a few minor comments were noted as follows:

- In the screening evaluation, an average total petroleum hydrocarbon (TPH) concentration was applied in the risk assessment. The average was used as sufficient data were not available to calculate a 95% upper confidence level on the mean (95% UCL). It is not clear why, consistent with the approach taken for the chemical/radiological risk screen, the maximum concentration was not applied. As the data were not provided, the maximum detected concentration could not be compared to the screening value. While this would most likely not impact the overall conclusions of the screening assessment, the



maximum TPH concentration should be compared to the appropriate screening value.

Table 1 includes lead in the calculations of hazard quotient and hazard index (HI). The screening value for lead is based upon blood-lead levels and is not appropriate to include lead in the determinations of hazard indices. Therefore, lead should be removed from the table. When lead is removed, the overall HI drops to 0.93, which is less than the NMED target level of 1.0.

This letter deliverable was emailed to you on December 15, 2005 at David.Cobrain@state.nm.us to Ms. Darlene Goering at Darlene.Goering@state.nm.us. A formalized hard (paper) copy of this letter deliverable will be sent via mail. If you have any questions, please call me at (303) 763-7188 or Ms. Paige Walton at (801) 451-2978.

Sincerely,



June K. Dreith
Program Manager

Enclosure

cc: Darlene Goering, NMED
Ms. Paige Walton, TechLaw