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January 18, 2013

DCN: NMED-2013-02

Mr. David Cobrain
New Mexico Environment Department (NMED)
Hazardous Waste Bureau
2905 Rodeo Park Dr. E/Bldg 1
Santa Fe, NM 87505



RE: Evaluation of compliance with the Direction to Modify Supplemental Remedy Completion Report for Upper Los Alamos Canyon Aggregate Area, Former Technical Area 32, dated December 28, 2012.

Dear Mr. Cobrain:

This letter addresses the review of modifications to Los Alamos National Laboratory's (LANL) Supplemental Remedy Completion Report for Upper Los Alamos Canyon Aggregate Area, Former Technical Area 32, resulting from the Direction to Modify letter sent by NMED dated December 28, 2012.

A general comment required the inclusion of the construction worker scenario for both Solid Waste Management Units (SWMUs) 32-002(a) and 32-002(b). The revised report contained these evaluations; no technical issues were noted. While carbazole was omitted from the construction worker tables in Appendix F (Tables F-3.3-3 and F-4.2-5) the risks to carbazole were addressed in the uncertainties discussion of the risk assessment. Use of outdated toxicity data were applied; while EPA currently does not support using that toxicity data for risk evaluations, inclusion of this evaluation is acceptable and conservative and does not impact risk decisions. The modification letter also included four specific comments. The revised report was revised to adequately address these four issues. No additional comments or issues were noted.

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

Thank you,

Paige Walton
AQS Senior Scientist and Program Manager

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

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