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**ENVIRONMENT DEPARTMENT**  
**DOE OVERSIGHT BUREAU**  
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October 20, 1996

Mat Johansen, DOE AIP POC  
U. S. Department of Energy  
Los Alamos Area Office, MS A316  
Los Alamos, NM 87544

**RE: Review of "VCA Completion Report for TA-1 PRS 1-003(d)", Los Alamos National Laboratory, August, 1996.**

Dear Mr. Johansen:

The DOE Oversight Bureau (DOB) has reviewed the subject document. The following comments are provided for the purpose of communicating the results of the review. They are not provided or intended for the purpose of representing the regulatory position of the New Mexico Environment Department (NMED).

**General Comments:**

1. This report does not include an assessment of ecological risk. Risk to ecological receptors should be assessed before the site is proposed for No Further Action.
2. The potential for human health or ecological risk due to additive inputs from multiple nearby sources should be addressed in the report.
3. The risk assessment included in the report is based on a recreational scenario. It is our understanding that the NMED Hazardous and Radioactive Materials Bureau has requested that risk be calculated using a residential scenario as well as the "most likely exposure scenario". Therefore, risk values calculated using a residential scenario should be included.

**Specific comments:**

1. § 3.3.1, Page 12, Remedial Implementation

"The site was visited by representatives from the New Mexico Environment Department (NMED)/Agreement In Principle (AIP) and LANL ESH Water Quality Group (ESH-18)... After visiting the site and reviewing the results of the VCA, the risk assessment, and the land use scenario, NMED and ESH-18 agreed that run-on protection was not needed for the site."

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FILE LANL HSWA Fu-1 04/078 TA-1-003(d)

Mat Johansen  
Review of VCA Report  
PRS 1-003(d)  
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It should be noted that the NMED DOE Oversight Bureau (DOE OB) does not represent the regulatory authority of the NMED. Observations and suggestions made by DOE OB staff during meetings or in the field are not provided or intended for the purpose of representing the regulatory position of the New Mexico Environment Department (NMED).

**2. § 3.3.2.3, Page 23, paragraph 2, Screening Assessment**

"The purpose of the MCE is to determine if chemicals present at concentrations below SALs should be retained as COPCs because of combined health effects of several chemicals."

All chemicals detected above 10% of the SAL should be included in the MCE, including those detected above SALs. Since there seems to be some confusion on this point, an understanding should be reached between DOE, LANL and NMED HRMB regarding the MCE calculation and regarding the chemicals retained for the calculation.

If there are any questions, please contact me at 505-672-0448 or Chris Hanlon-Meyer of the DOE Oversight Bureau Technical Support staff at 505-827-1536.

Sincerely,



Steve Yanicak, LANL POC  
Department of Energy Oversight Bureau

SY:CHM:chm

cc: Neil Weber, NMED, Chief DOE OB  
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