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December 15, 2014

NMED
Hazardous Waste Bureau

DCN: NMED-2014-19

Mr. David Cobrain
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Dr. East
Building One
Santa Fe, NM 87505

RE: Review of Responses to Notice of Deficiency (NOD) Comments on Revisions to the Los Alamos National Laboratory's (LANL's) *Investigation Report for Area of Concern (AOC) 01-007(k) in the Upper Los Alamos Canyon Aggregate Area*, November 2014.

Dear Mr. Cobrain:

This letter addresses the evaluation of the responses to NOD comments on the "*Investigation Report for Area of Concern (AOC) 01-007(k) in the Upper Los Alamos Canyon Aggregate Area*". Unless discussed below, the response to the NOD was deemed adequate as provided.

General Comment 1. Partially concur. The original comment allowed that the lines of evidence provided with this report were sufficient for analyses of the vapor intrusion pathway. However, the comment noted that for sites where the vapor intrusion pathway has been deemed complete, collection of active soil gas data would be required for assessing the pathway (over use of bulk soil data). The response indicated that the continued evaluation of the soil data, as presented in the investigation report for Area of Concern (AOC) 01-007(k) and other previous aggregate area reports, is adequate for most LANL sites where a plume does not exist. NMED acknowledges this response but further iterates that evaluation of the vapor intrusion pathway and requirement for soil gas data or other data needs to assess this pathway will be made on a site-by-site basis.

Specific Comment 3. Concur. Sufficient lines of evidence, to include site photos and historical activities, were provided to suggest that polycyclic aromatic hydrocarbons (PAHs) detected in site soil are likely from non-AOC sources. The photographs show the AOC being in close proximity to several paved areas with the surroundings being highly developed; based on the photos, it appears that runoff from surrounding areas onto the AOC is plausible. However, note that approval of the presence of the PAHs as being anthropogenic is not a blanket approval for all sites. Sufficient lines of evidence must be provided and agreement on the potential source(s) for constituents in background will be made on a case-by-case basis. In addition, if any constituent is eliminated as a constituent of concern for a site as a result of anthropogenic source(s), risks must still be evaluated and included in the uncertainty analyses (See Comment 9 below). It should be noted that the lines of evidence required may be vary between sites and in



some cases, delineation of source(s) using sampling may be required in defining background/anthropogenic levels.

Specific Comment 4. Partially concur. The revised handling of antimony, cadmium, and cyanide is acceptable as presented in the comment. There still appears to be a misunderstanding regarding the comment and allowance of comparison to background. Please note that the revised Soil Screening Guidance (November 2014) has been revised to include additional clarification concerning how to conduct a site attribution analysis.

Specific Comment 9. Concur. As noted for Specific Comment 3, it is agreed that the presence of PAHs at AOC 01-007(k) could be the result of non-SWMU activities, as discussed in the line of evidence and as shown in site photographs. As noted in the July meeting, the inclusion of the risks associated with the PAHs as part of an uncertainty assessment is acceptable and further helps assess potential impacts and overarching site risks.

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 Program Manager

Enclosure

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