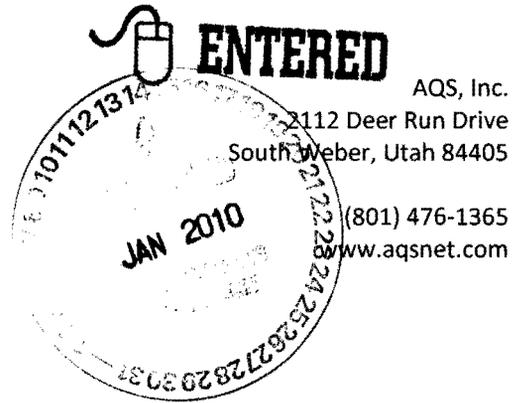




TA03



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January 11, 2010

DCN: NMED-2010-02

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

RE: Draft Evaluation of the *Nest Box Monitoring Plan for the Upper Pajarito Canyon Watershed*, Los Alamos National Laboratory, dated December 2009.

Dear Mr. Cobrain:

This letter addresses the evaluation of Los Alamos National Laboratory's (LANL) *Nest Box Monitoring Plan for the Upper Pajarito Canyon Watershed* (December 2009).

Overall, the next box monitoring plan is consistent with the proposed requirements outlined in Revision 1 of the *Pajarito Canyon Investigation Report* (IR) (August 2009). Only one comment on the proposed monitoring plan is noted below.

In previous investigations, sample analyses have been limited to metals due to egg and insect sample size limitations. Potential sample size limitations are recognized in the proposed nest box monitoring plan. In order to account for potentially low sample sizes, a priority is given to the order in which contaminants of potential concern (COPCs) will be analyzed: metals, followed by mercury, polychlorinated biphenyls (PCBs), and lastly, other organics. This order of precedence was established in the original biota plan. The concern is that over time, the database will only be populated with metals data. As PCBs are a concern in Pajarito Canyon, the potential lack of analytical data for PCBs may be a significant data gap in understanding ecological impacts.

In conjunction with analysis of eggs and insects, nest box data are collected on the percent fledged and percent females. The rationale for collecting data on the percent female provides some indication on impact from PCBs. It seems that it may be warranted to deviate from the order of COPC analysis to collect some analytical data on PCBs to correlate with other nest box data.

While a formal request to ensure that analysis for PCBs is not being made at this time, LANL should evaluate the overall data needs to see if deviations to the order of COPC hierarchy may be warranted.



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,

A handwritten signature in black ink that reads "Paige Walton". The signature is written in a cursive, flowing style.

Paige Walton
AQS Senior Scientist and Project Lead

cc: Dan Comeau, NMED (electronic)
Joel Workman, AQS (electronic)