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**ENTERED**

September 18, 2006

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. 06280.100; State of New Mexico Environment Department, Santa Fe, New Mexico; LANL Risk Assessment Support; Review of the Response to Comments on the Notice of Disapproval for the Remedy Completion Report for the Investigation and Remediation of Area of Concern 03-001(i) and Solid Waste Management Units 03-029 and 61-002, at Technical Areas 3 and 61, Los Alamos National Laboratory EPA ID No: NM0890010515, HWB-LANL-03-007," Dated July 11, 2006, Task 2 Deliverable.

Dear Mr. Cobrain:

This letter serves as a deliverable for the above-referenced work assignment and addresses the review of the response to the risk assessment comments on the "Notice of Disapproval for the Remedy Completion Report for the Investigation and Remediation of Area of Concern 03-001(i) and Solid Waste Management Units 03-029 and 61-002, at Technical Areas 3 and 61, Los Alamos National Laboratory [LANL] EPA ID No: NM0890010515, HWB-LANL-03-007," dated July 11, 2006.

The response to the risk assessment comments (Comment Numbers 9 – 11) are adequate as presented. With respect to the response to Comment Number 8 regarding the potential impacts of soil on groundwater, TechLaw concurs that the site contaminants are not likely to pose a migration concern based on the qualitative evidence provided by LANL. However, we would like to emphasize that applying a soil screening level (SSL) based upon a dilution attenuation factor (DAF) of 20 is intended to be used as a screening tool and is not intended to be representative of all site conditions. If site concentrations are less than a SSL based on a DAF of 20, there is little concern that migration to groundwater could be a threat. However, in the event that the SSL is exceeded, a more refined SSL may be calculated using site-specific data (i.e., infiltration rate, hydraulic gradient, mixing zone depth, aquifer hydraulic conductivity, source length) and a site-specific DAF.

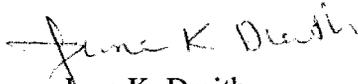
No additional comments have been drafted concerning these issues at this time.



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This letter deliverable was emailed to you on September 18, 2006 at David.Cobrain@state.nm.us to Ms. Swarna Vonteddu at swarna.vonteddu@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: Swarna Vonteddu, NMED  
Ms. Paige Walton, TechLaw  
Dallas/TechLaw Files