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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
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DALLAS TEXAS 75202-2733

August 10, 1999

**MEMORANDUM**

**SUBJECT:** Review of documents entitled: "3-010(a), 32-001, 32-002(a,b), 32-003, and 32-004 Ecological Risk Assessment Report (EM/ER: 98-386)"

**FROM:** Jeff Yurk  
RCRA Risk Assessment Team (6PD-O)

**TO:** David Neleigh, Chief  
NM/Federal Facilities RCRA Permits Section (6PD-N)

**THRU:** William Gallagher, Chief  
OK/TX RCRA Permits Section (6PD-O)

As requested, I have reviewed the document entitled: "3-010(a), 32-001, 32-002(a,b), 32-003, and 32-004 Ecological Risk Assessment Report (EM/ER: 98-386)" I have not received document entitled: "0-016VCA Completion Report (EM/ER:98-453)" which was also referenced in the NMED request letter. The report reviewed is intended to identify any need for interim corrective measures and to make recommendations on the appropriate spatial scale and relevant ecological values to be addressed in the ecological risk assessment. Overall the reports conclusions are based on an evaluation of complete exposure pathways and the adequacy of a previously submitted ecological screening methodology. The exposure pathway analysis appears adequate, however the use of the draft screening methodology does not.

The ecological screening levels (ESL's) used were generated from a previously submitted document which has not been finalized and/or approved. Also, toxicity reference values and bioaccumulation factors required to calculate such levels have not even been submitted at this time. A preliminary check of ESL's cited in the document against plant and invertebrate TRV's in the literature revealed that these numbers may be off by more than an order of magnitude in some cases.

More information is necessary in order to evaluate whether the recommendations made in this report are appropriate. If conclusions are to be drawn at this point, it should be clearly stated what concentrations were compared to what toxicity values with a full reference for the values



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used and an explanation of why the toxicity value selected is an adequate screening value.