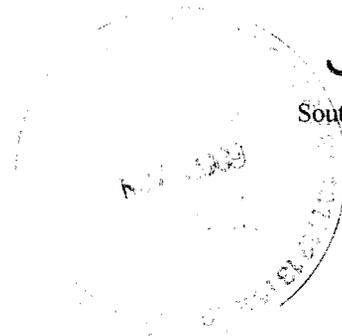


TA05



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November 20, 2009

DCN: NMED-2009-28

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

RE: Draft Technical Evaluation of the Response to Comments and Incorporation of Revisions into the *Cañada del Buey Investigation Report*, Revision 1, Los Alamos National Laboratory, New Mexico, dated November 2009

Dear Mr. Cobrain:

This letter serves as a deliverable and addresses the draft technical review of the response to comments and incorporation of revisions into the *Cañada del Buey Investigation Report*, Revision 1, Los Alamos National Laboratory (LANL), New Mexico (November 2009).

In previously submitted comments on the August 2009 version of the report, there was some concern that sufficient justification was not provided that the cyanide detections in the sediment are due to natural variations attributable to the Cerro Grande fires. While LANL concluded that the cyanide detections are all related to the Cerro Grande fire, LANL also indicates that Technical Area (TA) 54 may be a potential source for the cyanide. Detected cyanide concentrations are well below human health screening data and are only slightly above ecological screening levels. While it is unlikely that cyanide would drive ecological risks and potentially require additional monitoring, it was suggested that NMED further consider that cyanide be retained as potentially site related. As an official comment does not appear to have been provided to LANL on this issue, no additional changes were made in Revision 1 of the report. The exclusion of cyanide does not raise any immediate concerns, as previously indicated, because cyanide would not appear to be a significant driver for ecological risk in the various reaches investigated.

Portions of the Cañada del Buey watershed are used by the Pueblo de San Ildefonso for various native uses, including hunting. A comment was sent to LANL indicating that the risk assessment should be revised to include an evaluation of the subsistence hunting scenario. The hunting scenario was included as the resource user and followed previously reviewed and approved methodologies and input parameters. The report does not provide a calculation of risk but a ratio of risk. In addition, the report does not address the risks to the resource user in the uncertainty section or the overall conclusions and recommendations of the report. In the future, a discussion of all receptors, whether current or future, should be addressed in the uncertainty section as well as conclusions/recommendations section of the report. While the overall process is deemed

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Comments should not be evaluated as a final work product.*

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acceptable, there is some concern on the estimated risks/hazard. The estimated risks and hazards for the resource user are:

<u>Reach</u>	<u>Cancer Risk</u>	<u>Hazard Index</u>
CDB-3W	2E-04	3.7
CDB-3E	1.1E-04	7.7
CDB-4	below 1E-05	6.2

While above the NMED target cancer risk level of 1E-05 and the target hazard index of 1.0, the risk/hazard levels are not overly elevated. Based upon the assumptions that the above risks/hazards were estimated using maximum detected concentrations and that the resource user would be exposed to soil and game/biota impacted by the maximum concentration, the risks/hazards should be considered conservative in nature. Actual risk/hazard would most likely be less than calculated in the report.

No additional comments were noted on Revision 1 of the report.

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 Project Lead

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