

January 23, 2017

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Mr. David Cobrain  
New Mexico Environment Department (NMED)  
Hazardous Waste Bureau  
2905 Rodeo Park Dr. E/Bldg 1  
Santa Fe, NM 87505-6313

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Hazardous Waste Bureau

RE: Review of the Incorporation of Notice of Disapproval (NOD) comments into the *Revised Supplemental Investigation Report for Cañon de Valle Aggregate Area, Technical Area 14*, Los Alamos National Laboratory, December 2016.

Dear Mr. Cobrain:

This letter addresses our review of the *Revised Supplemental Investigation Report for Cañon de Valle Aggregate Area, Technical Area 14*, Los Alamos National Laboratory (dated December 2016) with respect to modifications based on the NOD submitted June 28, 2012. Our evaluation focused on the risk assessment related comments of the NOD, including General Comment No. 1 and Specific Comment Nos. 8-11. The specific comments contained in the NOD refer to Appendix H; please note that in the revised report, the risk assessment is now provided as Appendix G. Overall, the deficiencies have been resolved in the revised report.

General Comment 1. Section 5.3, which contained a discussion of the comparisons of weathered Qbt 4 concentrations with soil and soil background concentrations has been removed from the revised report. The selection of constituents of potential concern (COPCs) in the revised report follows current and appropriate methodology based on a tiered statistic approach using the Gehen, quartile and slippage tests. The results of the statistical tests are provided at the end of Appendix F. Review of the revised data indicates that COPC selection is adequate. No additional comments are noted.

Specific Comment 8. The acronym for the exposure point concentration has been updated (Section G-3.3). No additional comments are noted.

Specific Comment 9. The 2012 version of the report contained additional screening for COPCs for the ecological risk assessment that were not consistent with approved methodology at the time of the review. This additional screening has been removed from the revised report. The selection of COPCs follows current and approved methodologies. Further, the screening of ecological risk follows the current tiered approach using populations use factors, lowest observed adverse effect levels (LOAELs) and lines of evidence in the uncertainty section. No additional comments are noted.



Specific Comment 10. The screening quotient for HMX for the minimum ecological screening level (ESL) comparison has been corrected (Table G-5.3-6) for Solid Waste Management Unit (SWMU) 14-003. No additional comments are noted.

Specific Comment 11. No response was required to correct the toxicity data used in the 2012 Johnson and Ettinger modeling, as the result was conservative. However, the revised report does provide additional lines of evidence to support the vapor intrusion pathway, consistent with the 2015 NMED soil screening guidance. No additional comments are noted.

If you have any 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

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