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December 7, 2011

DCN: NMED-2011-37

Mr. David Cobrain  
New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Dr. East  
Building One  
Santa Fe, NM 87505



RE: Evaluation of the Responses to the Notice of Disapproval for the Investigation Report for Potrillo and Fence Canyons Aggregate Area, Los Alamos National Laboratory (LANL)

Dear Mr. Cobrain:

This letter addresses the evaluation of Los Alamos National Laboratory's (LANL) response to the Notice of Disapproval (NOD) for the Potrillo and Fence Canyons Aggregate Area. As noted in an email dated December 6, 2011, Ms. Neelam Dhawan requested a review of the NOD response for specific comment nos. 1, 3, 12, 22, 23, and 25 and whether the responses should be approved.

All of the responses were adequate as provided.

In the responses to comment nos. 22, 23, and 25, LANL indicates that reporting totals for total congeners (e.g., hexachlorodibenzodioxins [total]) are artifacts of the analytical method and are not representative of individual dioxin and furan congener detections or concentrations. LANL further indicates that it is standard practice for analytical laboratories to provide totals data unless requested not to do so. In speaking with other chemists, this appears to be valid. There is some concern that only hept- and octa-congeners were detected and reported; however, as LANL intends to collect additional investigation samples for completing the nature and extent of dioxin/furan contamination, no additional comments were deemed warranted at this time.

If you or any of your staff have questions, please contact me at (801) 451-2864 or via email at [paigewalton@msn.com](mailto:paigewalton@msn.com).

Thank you,

Paige Walton  
AQS Senior Scientist and Program Manager

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

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