

TA21

Subject: Human Health and ECO Risk Screening Assessments at DP Tank Farm

Date: Thu, 9 Aug 2001 19:14:59 -0600

From: "Paula Bertino" <pmb@lanl.gov>

To: <vickie_maranville@nmenv.state.nm.us>

CC: <jaynej@lanl.gov>, <dholmquist@lanl.gov>, <katzman@lanl.gov>, <paula.neal@worldnet.att.net>

Hi Vickie. Pursuant to our conversation earlier today, I'm attempting to clarify and document the approach LANL is to take for the human health and ecological risk screening and/or risk assessments in the forthcoming RFI Report for PRS 21-029 (DP Tank Farm).

1) The PRS identified as DP Tank Farm consists only of the mesa top portion of the site between DP Road north to the DOE fence along DP Canyon (consistent with the SWMU Report description). LANL was required to determine the nature and extent of an apparent release manifested by two hydrocarbon sheens within the DP Canyon stream channel (western and eastern seep investigation areas, respectively).

2) The responses provided to specific comments in the approved RSI Response documented that DP Tank Farm stored and distributed only petroleum products. The organic and inorganic analyses specified in Table 4 on page 23 of the RSI Response were identified to detect the analytes of concern associated with the petroleum products previously stored at the site, which correspond to the chemicals of concern listed in Table 4-1 in the NMED UST regulations Guidelines for Corrective Action (including lead).

3) As stated in the approved RSI Response and in the approved RFI Report outline for DP Tank Farm, the RFI Report will discuss only the organic and inorganic (lead only) COPCs associated with the petroleum hydrocarbons previously stored at the site and that are regulated by the UST Bureau (Table 4-1 in the NMED UST regulations Guidelines for Corrective Action). The radionuclide results (Am-241, C0-61, Cs-134, Cs-137, U-235 and tritium) for the sample collected at depth from the borehole adjacent to the former West Fill Station will also be reported and discussed. All other data will just be reported in Appendices C and D.

4) Only the petroleum hydrocarbon-related analytical results from the sediment samples collected from locations identified in Subreaches DP-1 West and DP-1 Central to fill data gaps remaining in the DP Canyon Reach Report will be reported and discussed in the RFI report. Stream channel sediment results for analytes specific to the DP Reach Report (i.e., PCBs and radionuclides) will be provided in an Appendix and to the Canyons Focus Area for inclusion in future data assessments for DP Canyon.

5) The approved RSI Response states that PRS 21-029 would be characterized and remediated (if necessary) in accordance with RCRA (Corrective Action.) and that any cleanup would meet NMED UST standards. (LANL response to G5, page 18 of the RSI Response) The response goes on to state that upon completion of characterization and any require remediation, that the PRS would be proposed for no further action under Criterion 5, which states that the PRS has been characterized and/or remediated in accordance with applicable state and federal regulations and the available data indicate that contaminants pose an acceptable level of risk under current and projected future land use. This would indicate that the UST-regulated COPCs (and the radionuclide results from the sample collected from the borehole adjacent to the west fill station) will be evaluated according to the standard ER screening procedures for human health and ecological risk. This approach makes perfect sense when applied to the actual PRS which is the mesa top portion of the site, which is slated for transfer to LA County.

However, this approach toward data assessment doesn't make sense for the data obtained north of the fence from the canyon sides and stream channel of



DP Canyon since the data is only going to be used to confirm the determination of nature and extent and to support the site conceptual model and fate and transport. We've acknowledged from the beginning that the canyon and stream channel north of DP Tank Farm will remain part of the Canyon's Focus Area (and under DOE control). However, we have not addressed what decisions will be made with this data and how to assess the data collected from this area (western and eastern seep investigation areas). The approved RFI Report outline for DP Tank Farm (Sections 5.2.2, 5.2.3, 5.3.2 and 5.3.3) would indicate that this data is to be assessed according to the standard ER screening procedures for human health and ecological risk, but as Danny and Rich pointed out earlier today this may not be prudent since DP Canyon is part of the Los Alamos/Pueblo Canyon watershed and all data from this investigation and ongoing investigations in DP Canyon will be assessed with the DP Canyon data set and as part of the watershed data set.

When we talked earlier today, you thought that it would be acceptable to defer the ECO risk assessment for the DP canyon portion of the data set (north of the fence) to the Canyons Focus Area's ongoing investigations and assessments and that we would determine how to adequately address this approach in the RFI report next week. However, we did not specifically address the human health screening assessment of the DP canyon portion of the data set. It probably does not make sense to do one assessment without doing the other. Would it be acceptable to also defer the HH risk assessment for the DP canyon portion of the data set (north of the fence) to the Canyons Focus Area's ongoing investigations and assessments as well? How does NMED want us to handle the data set from the DP Canyon portion of the site? Let's talk Monday. Thanks.
Paula

NFA - eco & human health
for canyon —