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November 2, 2012

DCN: NMED-2012-26

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



RE: Draft Technical Review Comments on the Draft "Evaluation of Contamination on Los Alamos County Property within Former Technical Area 32," dated October 2012

Dear Mr. Cobrain:

This letter addresses the review of the Los Alamos National Laboratory's (LANL) Draft report ("Evaluation of Contamination on Los Alamos County Property within Former Technical Area 32," dated October 2012) addressing polycyclic aromatic hydrocarbons (PAHs) detected in Los Alamos County property within Technical Area (TA) 32. Several points of discussion are noted below.

1. The bulk of the report addresses the historical operations by LANL at TA-32 and concludes that the PAHs detected on property to be transferred to Los Alamos County are not present due to past LANL activities but are anthropogenic in nature. Based on the information provided, it appears reasonable to conclude that PAHs may be present from urban runoff and not LANL operations. However, the two maps provided in the draft report do not allow a clear understanding of the locations of the roads etc., which LANL assumes are the sources for the PAHs. It would help to include a photograph of the area or include a map clearly showing roads and parking areas and the primary runoff channels suspected as the source(s) for the PAHs.
2. Section 4.0 of the Draft report states that, "Section 5.7.4 of the RAGS [Risk Assessment Guidance for Superfund] provides that anthropogenic background chemicals may be identified and considered separately during or at the end of the risk assessment, or they may be omitted entirely from the set of chemicals of potential concern (COPCs). When determined to be anthropogenic background contamination, PAHs may therefore be properly excluded from the risk assessment in accordance with the RAGS." Following this approach, LANL chose to eliminate PAHs from evaluation. However, RAGS further goes on to state that, "Omitting anthropogenic background chemicals from the risk assessment could result in the loss of important information for those potentially exposed" and recommends that the chemicals be considered separately or at least at the



end of the risk assessment. Because LANL is aware that the property in question is to be turned over to Los Alamos County for future development, precautions should be used to ensure the new land owner is aware of potential risks associated with the anthropogenic levels of PAHs in soils as assessed by LANL. As such, a section should be included in the report that summarizes the PAH data on Los Alamos County property and the potential risks associated with the PAHs to afford Los Alamos County a complete understanding of the property and how they may want to develop it and/or restrict types of use for future development (such as prohibiting a day care). Revise the Draft report to include a section discussing the risks associated with the PAHs detected on property to be transferred to Los Alamos County.

3. Figure 3.0-2. Several of the COPCs are indicated to have data that are “replaced”. Clarify what this means and what data were replaced.

Overall, it is likely the PAHs are, at least in part, anthropogenic. However, because the PAHs do represent adverse risk, it is suggested that approval of this report include acknowledgement of the risks associated with anthropogenic PAHs to allow Los Alamos County a complete understanding of the property and to allow for sound risk management decisions regarding land development.

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 Program Manager

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