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June 27, 2011

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Mr. David Cobrain
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Dr. E, Bldg 1
Santa Fe, NM 87505

RE: Draft Technical Review of Investigation Report for Lower Sandia Canyon Aggregate Area, Los Alamos National Laboratory, March 2011

Dear Mr. Cobrain:

This letter addresses the draft technical review of the risk assessments in the "Investigation Report for Lower Sandia Canyon Aggregate Area," Los Alamos National Laboratory (LANL), Dated March 2011. Only three sites had nature and extent defined to move forward with risk analysis. Of those three sites, only two had constituents of potential concern (COPCs) identified and actual risks estimated.

SWMU 53-001(b) was identified as an outdoor storage area that once was used for storage of drum racks used to store drums of products and wastes associated with maintenance activities conducted in building 53-2. Wastes included spent trichloroethene (TCE), Freon, other solvents, and acidic waste. In reviewing the sampling data for this site, it appears that the only sampling conducted was downgradient of the storage area. No samples have been taken at or beneath the storage area. While the report indicates the photographs did not show evidence that there had been any spills, the exact spill history of this site is most likely unknown. It is not clear why no samples were collected at the storage area itself. It seems that borings through the concrete and collection of subgrade samples are needed to fully characterize this site. NMED may wish to further evaluate the nature and extent of contamination for this site and determine whether additional samples at the former storage pad itself are warranted.

The following are the technical review comments noted for the two risk assessments included in the report:

1. Section 7.3.4.3. The discussions of inorganic chemicals and organic chemicals both state that because the extent of contamination is not defined for the site, inorganic/organic COPCs have not been defined. Yet, COPCs were identified for the site and risk determinations made. Please clarify.

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2. Section 7.13.4.4. "Antimony was not detected above BV [background value] but had DLs [detection limits] (0.526 mg/kg to 1.1 mg/kg) above the tuff BV (0.5 mg/kg) in 31 samples. Because antimony was not detected above the BV, the lateral and vertical extent of antimony are defined." As the detection levels were above background, it is possible that antimony is present at levels above background but below the detection levels. As such, the comparison of site data to background does not necessarily indicate that nature and extent are defined. However, it is agreed that there does not appear to be significant contamination from antimony and that additional sampling and analyses are not warranted. No response to this comment is required.

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

Paige Walton
AQS Senior Scientist and Program Manager

CC: Neelam Dhawan, NEMD (electronic)
Joel Workman, AQS (electronic)