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560 Golden Ridge Road, Suite 130
Golden, CO 80401
(303) 763-7188
(303) 763-8889 FAX
www.techlawinc.com

February 23, 2005

Mr. David Cobrain
State of New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East
Building One
Santa Fe, New Mexico 87505-6303



Reference: Work Assignment No. 06110.290.0002; State of New Mexico Environment Department, Santa Fe, New Mexico; Human Health and Ecological Risk Assessment Support; Review of the ecological risk assessment for the Corrective Measure Study Report for Material Disposal area H, Solid Waste Management Unit 54-004, at Technical Area 54, Revision 1, Task 2 Deliverable.

Dear Mr. Cobrain:

This letter serves as a deliverable for the above-referenced work assignment, and addresses the technical review of the ecological risk assessment for Los Alamos's "Corrective Measure Study Report for Material Disposal area H, Solid Waste Management Unit 54-004, at Technical Area 54, Revision 1."

The ecological screening assessment was based upon modeled soil concentrations representative of incremental additions to existing background. The incremental concentrations were calculated from initial waste concentrations. It is not clear why modeled concentrations were used over the actual soil data that had been collected as part of the facility investigations. Based upon the text, it appears that the incremental concentrations are deemed more conservative than the present day concentrations. However, some clarification to this assumption may be needed. In addition, it may be helpful to discuss the modeled concentrations versus the actual soil data, to indicate whether the modeled concentrations represent a more conservative approach.

The maximum modeled concentrations were compared to background, and where the incremental concentration was greater than 10% of background, the constituent was retained for further analysis. It is not clear where the selection of the 10% came from, but it appears to be a conservative approach. Typically soil concentrations are

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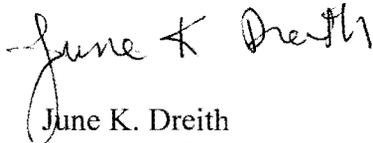
statistically compared to background, but in this case, since they are using modeled concentrations, a statistical analysis may not be appropriate.

The assessment included an evaluation of hazard to the constituent plus background. In order to obtain the exposure concentration the modeled soil concentration was added to the background concentration. This is an appropriate method, as actual soil samples would include any site contamination plus background.

Overall, there does not appear to be unacceptable risk to ecological receptors associated with the MDA H containment alternatives.

This letter was emailed to you on February 23, 2005 at David_Cobrain@nmenv.state.nm.us and to Ms. Neelam Dhawan at Neelam_Dhawan@nmenv.state.nm.us. If you have any questions, please call me at (303) 763-7188 or Ms. Paige Walton at (801) 451-2978.

Sincerely,



June K. Dreith
Program Manager

Enclosure

cc: Ms. Neelam Dhawan, NMED
Ms. Paige Walton, TechLaw