ERID-249067

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Date: AUG 27 2013
Refer To: EP2013-0128

John Kieling, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Submittal of the Supplemental Investigation Report for Upper Sandia Canyon Aggregate Area

Dear Mr. Kieling:

Enclosed please find two hard copies with electronic files of the Supplemental Investigation Report for Upper Sandia Canyon Aggregate Area. Based on the data evaluation guidelines Los Alamos National Laboratory (the Laboratory) used in 2009 when the original investigation report was prepared, the Laboratory concluded that the extent of contamination was not defined for 41 solid waste management units and areas of concern within the Upper Sandia Canyon Aggregate Area. Recommendations for additional sampling at these sites to define extent were presented in the Phase II investigation work plan that was approved by the New Mexico Environment Department (NMED) in September 2011.

In January 2012, after the Phase II investigation work plan had been approved, NMED and the U.S. Department of Energy (DOE) entered into a framework agreement for the realignment of environmental priorities at the Laboratory. Under the framework agreement, NMED and DOE agreed to review characterization efforts undertaken to date pursuant to the Compliance Order on Consent to identify those sites where the nature and extent of contamination have been adequately characterized.

Pursuant to the framework agreement, the Laboratory reviewed its data evaluation process with respect to EPA guidance and the framework agreement principles and concluded that the process could be revised to complete site characterization more efficiently, while providing full protection of human health and the environment. Specifically, the process for evaluating data to define extent of contamination was revised to provide a greater emphasis on risk/dose reduction, consistent with EPA guidance. This revised process includes (1) initially identifying chemicals of potential concern (COPCs) to focus efforts on the constituents of most concern; (2) screening COPCs against soil screening levels and screening action levels during determination of extent to focus efforts on characterizing contamination potentially posing a risk/dose and requiring corrective action; and (3) performing screening level risk/dose evaluations on all sites, even if extent is not defined, to incorporate risk/dose reduction into recommendations for further actions. As discussed and agreed

to with your staff in a meeting on April 23, 2013, the Laboratory will present the results of these revised data evaluations in supplemental investigation reports.

The data for the 41 sites proposed in the Phase II investigation work plan for Upper Sandia Canyon Aggregate Area and data from an additional site remediated in 2005–2006 were reevaluated using this revised process, and the results are presented in the attached supplemental investigation report. A revised Phase II investigation work plan will be developed and submitted to NMED after this supplemental investigation report is approved.

If you have any questions, please contact Kent Rich at (505) 665-4272 (krich@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (cheryl.rodriguez@nnsa.doe.gov).

Sincerely,

Jeff Mousseau, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,

Peter Maggiore, Assistant Manager
Environmental Projects Office
Los Alamos Field Office

JM/PM/DM/KR:vt

Enclosures: Two hard copies with electronic files – Supplemental Investigation Report for Upper Sandia Canyon Aggregate Area (LA-UR-13-26024)

Cy: (w/enc.)
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Kent Rich, EP-CAP, MS M992
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