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NMED
Hazardous Waste Bureau

Associate Director for ESH
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National Nuclear Security Administration
Los Alamos Field Office, MS A316
Environmental Projects Office
Los Alamos, New Mexico 87544
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Date: NOV 25 2014

Refer To: ADESH-14-128

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 Response to the Notice of Disapproval for the Investigation Report for Area of Concern 01-007(k) in the Upper Los Alamos Canyon Aggregate Area and Revision 1

Dear Mr. Kieling:

Enclosed please find two hard copies with electronic files of Los Alamos National Laboratory's (the Laboratory's) response to the notice of disapproval (NOD) for the Investigation Report for Area of Concern 01-007(k) in the Upper Los Alamos Canyon Aggregate Area, Revision 1 of the report, and a crosswalk table of comment responses and report revisions.

Based on discussions during a July 31, 2014, meeting between Laboratory and New Mexico Environment Department (NMED) personnel, the report has been revised to present a more comprehensive and appropriate lines of evidence explaining why the polycyclic aromatic hydrocarbons (PAHs) detected at the site are not site-related. Because NMED has expressed concern associated with potential risks of the PAHs detected at Area of Concern 01-007(k), results of the risk-screening evaluation have been provided in the response to the NOD, indicating no unacceptable risk to human health or the environment.

In addition, per the July 31, 2014, meeting, the text identifying inorganic chemicals of potential concern has been revised to present the lines of evidence (including comparisons with the maximum background concentrations) for eliminating or retaining some inorganic chemicals.

If you have any questions, please contact Todd Haagenstad at (505) 665-2936 (hth@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (cheryl.rodriguez@nnsa.doe.gov).

Sincerely,



Michael T. Brandt, DrPH, CIH, Associate Director
Environment, Safety, and Health
Los Alamos National Laboratory

Sincerely,



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

MB/PM/DM/TH:sm

Enclosures: Two hard copies with electronic files:

- (1) Response to the Notice of Disapproval for Investigation Report for Area of Concern 01-007(k) in the Upper Los Alamos Canyon Aggregate Area (LA-UR-14-28892)
- (2) Cross-reference table of NMED notice of disapproval comments and revisions to the report
- (3) Investigation Report for Area of Concern 01-007(k) in the Upper Los Alamos Canyon Aggregate Area, Revision 1 (LA-UR-14-28893)
- (4) An electronic copy of the redline-strikeout version of the plan that includes all changes and edits to the document

Cy: (w/enc.)
Cheryl Rodriguez, DOE-NA-LA, MS A316
Todd Haagenstad, EP-CAP, MS M992
Public Reading Room (EPRR)
ADESH Records (electronic copy)

Cy: (Letter and CD and/or DVD)
Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-DOE-OB, MS M894
Rich Mirenda, EP-CAP (w/ MS Word files on CD)
PRS Database

Cy: (w/o enc.)
Tom Skibitski, NMED-DOE-OB (date-stamped letter emailed)
lasomailbox@nnsa.doe.gov
Annette Russell, DOE-NA-LA (date-stamped letter emailed)
David Rhodes, DOE-NA-LA (date-stamped letter emailed)
Kimberly Davis Lebak, DOE-NA-LA (date-stamped letter emailed)
Dave McInroy, EP-CAP (date-stamped letter emailed)
Randy Erickson, ADEP (date-stamped letter emailed)
Tony Grieggs, ADESH-ENV-CP (date-stamped letter emailed)
Alison Dorries, ADESH-ENV-DO (date-stamped letter emailed)
Michael Brandt, ADESH (date-stamped letter emailed)