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NMED
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Date: NOV 19 2015

Refer To: ADESH-15-168

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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 S-Site Aggregate Area

Dear Mr. Kieling:

Enclosed please find two hard copies with electronic files of the Supplemental Investigation Report for S-Site Aggregate Area. Based on the data evaluation guidelines Los Alamos National Laboratory (the Laboratory) used in 2010, when the original investigation report was prepared, the Laboratory concluded that the extent of contamination was not defined for 61 solid waste management units and areas of concern and two additional investigation areas in the S-Site Aggregate Area. Recommendations for additional sampling at these sites to define extent were presented in the investigation report that was approved by the New Mexico Environment Department (NMED) in March 2011 (HWB-LANL-10-071). Additional sampling requirements for these 63 sites/areas were documented in the Phase II investigation work plan for S-Site Aggregate Area and submitted to NMED in September 2011.

After the approval of the investigation report and submittal of the Phase II investigation work plan, 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 U.S. Environmental Protection Agency (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.

The 2009–2010 investigation data for the 63 sites/areas proposed for Phase II investigation 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.

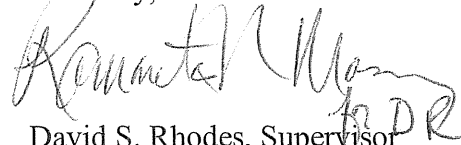
If you have any questions, please contact Kent Rich at (505) 665-4272 (krich@lanl.gov) or Ramoncita Massey at (505) 665-7771 (ramoncita.massey@em.doe.gov).

Sincerely,



Alison M. Dorries, Division Leader
Environmental Protection Division
Los Alamos National Laboratory

Sincerely,



David S. Rhodes, Supervisor
Environmental Management
Los Alamos Field Office

AD/DR/BR/KR:sm

Enclosures: Two hard copies with electronic files – Supplemental Investigation Report for S-Site Aggregate Area (EP2015-0065)

Cy: (w/enc.)
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