
Subject: ECORISK Methods Rev 5
Attachments: DRAFT_NMED Comments LANL Eco Methods_r5.pdf

From: Murphy, Robert, NMENV [<mailto:Robert.Murphy@state.nm.us>]
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Subject: ECORISK Methods Rev 5

Kent,

Attached are NMED's draft comments on *Screening-Level Ecological Risk Assessment Methods, Revision 5*.

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DRAFT NMED Technical Review Comments on the
Screening-Level Ecological Risk Assessment Methods, Revision 5
Los Alamos National Laboratory
Los Alamos, New Mexico,
Dated September 2017

1. Figure 2.1-1, Laboratory TAs in Relation to Surrounding Landholdings, p.3:

A redrawn Figure 2.1-1 has been included in the *Screening-Level Ecological Risk Assessment Methods, Revision 5*, Los Alamos National Laboratory, LA-UR-17-28553 dated September 2017 (Eco Risk Methods Rev. 5). The information depicted on the new version of Figure 2.1-1 generally reflects that provided in previous versions of the figure. However, Technical Area (TA) 74 is depicted differently (it appears smaller and fragmented from TA-72 and TA-73). The text of Eco Risk Methods Rev. 5 offers no explanation for the change. An explanation for revising the depiction of TA-74 in Figure 2.1-1 should be added to Eco Risk Methods Rev.5.

2. Table 3.3-1, Measures Required for the Wildlife Exposure Model, p. 30:

Table 3.3-1 lists a body weight of 0.56 kilograms (kg) for the mountain cottontail. The value is based on the minimum value reported in *Reproduction in the Audubon Cottontail in Arizona*, a 1957 paper by L.K. Sowls. While the use of the mountain cottontail as an ecological receptor is appropriate for LANL, it is unclear why the information in the Sowls paper was used to estimate a body weight for the receptor. Because the mountain cottontail is not designated a “default” ecological receptors in the NMED RAG, Eco Risk Methods Rev. 5 should be revised to include a brief discussion that justifies the use of the Sowls paper as the preferred source for information regarding body weight. In addition, the discussion should describe how the value listed in Table 3.3-1 was derived from the data presented in the Sowls paper.

3. Section 3.4.4, Water ESLs, p.41

Item number 2 at the bottom of page 41 includes a hyperlink that is intended to take the reader of Eco Risk Methods Rev.5 to EPA’s Ambient Water Quality Criteria. The EPA web site has been updated and this link now takes readers to a web page entitled Water Topics. Additional searching is required to reach the EPA ambient water quality criteria document referenced in previous versions of ecological risk methods document. The link should be revised to take the reader directly to the document referenced in item number 2.

4. Section 4.1, Scoping Evaluation, p.48

The third paragraph of Section 4.1 includes a hyperlink intended to take the reader of Eco Risk Methods Rev. 5 to EPA’s web page for ProUCL software. The EPA web site has been updated and this link now takes readers to a page that provides information of EPA’s Office of Science Policy. Additional searching is required to reach EPA’s web site for ProUCL. The

link should be revised to directly reference EPA's ProUCL web page (<https://www.epa.gov/land-research/proucl-software>).

5. Section 4.2, Screening Evaluation, p.53:

The fourth paragraph on page 53 references ECORISK Database Release 4.0 dated October 2016 (LANL 2016, 601838, or latest version). Once ECORISK Database Release 4.1 dated September 2017 becomes available, this reference citation and the listing in Section 5.0, References, for the ECORISK database should be updated accordingly.

6. Section 4.2, Screening Evaluation, p.53:

The fourth paragraph on page 53 provides a hyperlink to the most recent version of LANL's ECORISK Database. Throughout the technical review period, this link referred to a Service Unavailable page on LANL's web site. As part of the final revisions to Eco Risk Methods Rev. 5, ensure this hyperlink takes readers to ECORISK Database Release 4.1 dated September 2017.

7. Section 4.3.4, L-ESL Analysis, p. 59:

The first paragraph of Section 4.3.4 references ECORISK Database Release 4.0 dated October 2016 (LANL 2016, 601838, or latest version). Once ECORISK Database Release 4.1 dated September 2017 becomes available, this reference citation and the listing in Section 5.0, References, for the ECORISK database should be updated accordingly.