

**Response to the “Notice of Disapproval [for the] Cañada del Buey Investigation Report,
Los Alamos National Laboratory EPA ID No: NM0890010515, HWB-LANL-09-040,”
Dated October 30, 2009**

INTRODUCTION

To facilitate review of this response, the New Mexico Environment Department’s (NMED’s) comments are included verbatim. Los Alamos National Laboratory’s (LANL’s or the Laboratory’s) responses follow each NMED comment.

NMED Comment

1. *As noted in Sections 1.3 and 1.4 of the Report, portions (43 percent) of the Cañada del Buey watershed drainage area are located on Pueblo de San Ildefonso land and are used by residents of the Pueblo de San Ildefonso for various cultural uses, including hunting. Several of the constituents of concern (COCs) carried forward in the risk assessment show a tendency to bioaccumulate. As such, risks to the people of the Pueblo de San Ildefonso via ingestion of potentially contaminated game, and specifically through a subsistence hunting scenario, must be identified as a current and reasonably foreseeable future land use and must be evaluated in the Report.*

The risk assessment must be revised to include an evaluation of the subsistence hunting scenario. The nature of the evaluation must be similar to the evaluation approach used by the Permittees for the North Canyons Investigation Report.

LANL Response

1. The Laboratory has added a resource-user scenario as a supplemental exposure scenario in section E-4.0, following the evaluation approach used in the North Canyons Investigation Report, Revision 1 (LANL 2009, 106506). This scenario includes exposure to contaminants through plant and meat pathways. Under this approach, risks are calculated for all chemicals of potential concern (COPCs) identified in section 6.2 in the reaches located on or immediately adjacent to the Pueblo de San Ildefonso (CDB-3W, CDB-3E, and CDB-4). This information addresses the potentially bioaccumulative contaminants cited in this comment.

NMED Comment

2. *The Report does not contain a Table 3.2-1 and the table is not listed in the Report Table of Contents. The Permittees must either provide the table or delete the reference to the table.*

LANL Response

2. The Laboratory has added Table 3.2-1 to the revised report. In addition, Table 3.1-1, cited in section 3.1, was inadvertently left out of the report and has been added to the revised report.

NMED Comment

- 3. The primary current and future receptors for the human health risk assessment were identified as recreational. While it is unlikely that cyanide would drive ecological risks and potentially require additional monitoring, cyanide must be retained as being potentially site related relative to Technical Area 54 (TA-54) and one or more of the material disposal areas located within or adjacent to TA-54. The Permittees recognize the possible release of cyanide from TA-54 in Section 7.1.4.5 of the Report by stating: "Small quantities of several inorganic chemicals may also have been released from TA-54 (e.g., aluminum, antimony, and cyanide)." A formal response to this comment is not required.*

LANL Response

- 3.** No response is required.

REFERENCE

LANL (Los Alamos National Laboratory), June 2009. "North Canyons Investigation Report," Los Alamos National Laboratory document LA-UR-09-1670, Los Alamos, New Mexico. (LANL 2009, 106506)

Cross-Reference of NMED NOD Comments and Revisions to Cañada del Buey Investigation Report, Revision 1

NMED NOD Comment No.	Summary of NOD Comment Requirement	Section(s)/Page(s) in Original Report	Section(s)/Page(s) in Revised Report	Nature of Revision
1	Risks to the residents of the Pueblo de San Ildefonso via ingestion of potentially contaminated game must be evaluated (specifically a subsistence hunting scenario) as hunting is a current and reasonably foreseeable future land use in Cañada del Buey. Revise the report accordingly.	Section 8.2 Appendix E	Section 8.2.1 Section 8.2.3.2 Section 8.2.5 Section E-4.0	A subsistence hunter scenario was evaluated and is included in Section E-4.0.
2	Table 3.2-1 is listed in the text but is not included in the report or in the table of contents. This table must be added or reference to it needs to be deleted.	Section 3.2.2	Section 3.2.2	This table has been added to the revised report. Note that Table 3.1-1, cited in Section 3.1, was also inadvertently left out of the report and has been added in the revision.
3	Cyanide must be considered as having a potential source at TA-54. A formal response to this comment is not required.	Section 7.1-1	Not applicable	As stated in NMED's comment, no response or revision to the investigation report is required.