

Tri-Valley CAREs

Communities Against a Radioactive Environment

2582 Old First Street, Livermore, CA 94551 • (925) 443-7148 • www.trivalleycares.org



*Peace Justice Environment
since 1983*

July 5, 2012

Claire Holtzapple
U.S. Department of Energy
Livermore Environmental Programs Division
Lawrence Livermore National Laboratory
POB 808 L-574, Livermore, CA 94551

Subject: Tri-Valley CAREs' comments on the Draft Five-Year Review Report for the High Explosives Process Area Operable Unit at Lawrence Livermore National Laboratory Site 300

Dear Claire:

Below are Tri-Valley CAREs comments on the draft document. Thank you for the opportunity to offer public input and we look forward to your response and to relevant revisions in the final document.

Sincerely,

Marylia Kelley
Tri-Valley CAREs

Peter Strauss
PM Strauss and Associates

Cc
Andrew Bain, U.S. EPA
Jacinto Soto, DTSC
Marcus Pierce and Aimee Phiri, CVRWQCB
Leslie Ferry, LLNL

We have three main comments:

1. Since the High Explosives Process Area Operable Unit is part of the Site Wide Remedy, Remedial Action Objectives (RAOs) should be the same as those in the Site-Wide Record of Decision (ROD). There are a few RAOs that are not identified in the Draft Five-Year Review that are in the ROD. Please correct.
2. We agree that additional capture wells are necessary to offset the effect of intermittent pumping at the off-site Gallo Well 1.
3. Additional consideration should be given to risk mitigation from the inhalation pathway (6.4.2). EPA Region 9 toxicologists have recommended an industrial removal action level (RAL) for TCE of 15 microgram per cubic meter ($\mu\text{g}/\text{cm}^3$) at another site in the Bay Area. This RAL is based on non-cancer health endpoints in the latest Toxicological Evaluation

released in September 2011. Specifically, it was shown that TCE has teratogenic effects on fetal heart development during 21 days in the first trimester of pregnancy. It is important to mention this and implement protective actions while EPA headquarters is trying to resolve differences among various parties and Region 9 concerning this RAL. While the other site is indoors, and the site at the HEPA OU is ambient around Spring 5, this “draft” RAL should be taken into consideration when developing a risk mitigation strategy. And because the Toxicological Evaluation is based in part on animal studies, it is important to carry this over to the ecological risk assessment.