

Comments on October 31, 2002, “Response to Comments and submission of slip pages – 2001 Annual Groundwater Treatment System and Water Monitoring Report, Laboratory for Energy-Related Health Research and South Campus Disposal Site (LEHR/SCDS)” (DOE LEHR Superfund Site)

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January 21, 2003

Page 1 of the Executive Summary , section 0.1, last two lines of the first paragraph: UCD and their consultants continue to use extra words around describing nitrate. The wording, “*nitrate as nitrogen (nitrate)*,” is inappropriate. All that needs to be said is “nitrate.” This is a well-defined chemical species, and there is no need to say “nitrate as nitrogen,” unless there is a concentration expressed with it.

On page 38 of the new inserts, first line, where it states, “*Nitrate results for PCU ...*,” does not specify whether these results are for nitrate or N. This is a situation where the units used must be specified.

Page 38, last two lines state, “*No other pesticides or PCBs were reported above CRDLs in samples collected from surface water locations during 2001.*” In any discussion of this type, where detection limits are indicated as not being exceeded, there is need to indicate the detection limits and discuss the adequacy of the detection limits relative to the US EPA CTR criteria. There has been a chronic problem at the LEHR site with UCD and DOE using analytical methods which do not have detection limits that are sufficiently sensitive to measure pesticides and some other constituents at concentrations at or below the CTR criteria.

On page 5 of the responses to comments, Patti Collins has noted a number of inconsistencies in the UCD LEHR annual report. These are the same kinds of chronic inconsistencies that have been reported on by DSCSOC over the years. UCD’s annual reports are sloppily put together and inadequately proofread, and, in general, UCD has not taken the time it should to develop credible reports on the data obtained.