

Letter Health Consultation

Evaluation of Environmental Data Generated Since
ATSDR's 2005 Public Health Assessment

MOLYCORP NPL SITE
(CHEVRON MINING INC.)

QUESTA, NEW MEXICO

EPA FACILITY ID: NMD002899094

SEPTEMBER 20, 2011

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Agency for Toxic Substances and Disease Registry
Division of Health Assessment and Consultation
Site and Radiological Assessment Branch
Atlanta, Georgia 30333

Health Consultation: A Note of Explanation

A health consultation is a verbal or written response from ATSDR or ATSDR's Cooperative Agreement Partners to a specific request for information about health risks related to a specific site, a chemical release, or the presence of hazardous material. In order to prevent or mitigate exposures, a consultation may lead to specific actions, such as restricting use of or replacing water supplies; intensifying environmental sampling; restricting site access; or removing the contaminated material.

In addition, consultations may recommend additional public health actions, such as conducting health surveillance activities to evaluate exposure or trends in adverse health outcomes; conducting biological indicators of exposure studies to assess exposure; and providing health education for health care providers and community members. This concludes the health consultation process for this site, unless additional information is obtained by ATSDR or ATSDR's Cooperative Agreement Partner which, in the Agency's opinion, indicates a need to revise or append the conclusions previously issued.

You May Contact ATSDR Toll Free at
1-800-CDC-INFO

or

Visit our Home Page at: <http://www.atsdr.cdc.gov>

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Prepared By:

U.S. Department of Health and Human Services
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Molycorp NPL site in Questa, NM: Evaluation of Environmental Data Generated Since ATSDR's 2005 Public Health Assessment

Introduction

In May 2010, the U.S. Environmental Protection Agency proposed the Molycorp (Chevron, Inc.) site in Questa, New Mexico to the National Priorities List for a second time. The proposal was repeated because EPA plans to finalize the listing and a significant amount of new data had been collected since the original 2000 proposed listing (personal communication, Mark Purcell, EPA Region 6, April 2011). ATSDR is required to conduct public health activities for every site proposed to the NPL. This memo evaluates whether ATSDR's previous activities related to the site's 2000 proposal to the NPL, culminating in a Public Health Assessment (PHA) finalized in 2005, are sufficient to address public health needs at this site.

Evaluation of Recent Environmental Data

ATSDR's February 2005 PHA considered data available up until November 2003. The final remedial investigation database for the site, the basis for the re-proposal, contains data from additional sampling events in 2003 and 2004¹. These sampling events were primarily additional rounds of samples collected previously with some additional locations included. ATSDR examined the final database in relation to the data evaluation in the 2005 PHA to determine if any of the previous conclusions are affected by the additional data.

The summary and the findings of this re-evaluation follow for the various exposure pathways considered in the 2005 PHA:

- Ingestion of Groundwater from Private Wells - The focus of ATSDR's first evaluation (2005) was primarily past exposures, because no one reportedly drinks water from known contaminated wells. The PHA also considered reports that the wells have not all been properly decommissioned and municipal water is not universally available. Past exposure could have resulted in adverse health effects, and if people drink the water now, could result in adverse health effects.
 - ATSDR's previous conclusion remains unchanged. We understand that the Record of Decision for the site provides for temporary alternative water supplies or point of use treatment systems until attainment of groundwater cleanup levels near the tailings facility. Please inform ATSDR if EPA has reason to believe that any other residents near Molycorp could still be drinking contaminated water.

- Inhalation of Tailings Dust: Although more recent data were also evaluated and discussed, the 2005 PHA's evaluation focused on past exposures to tailings dust, because dust levels were higher before dust control measures were implemented in the 1990s. The PHA found that short-term dust levels could have resulted in adverse health effects in sensitive groups. However, no adverse health effects were likely from exposure to metal contaminants in the dust.
 - ATSDR's previous conclusion remains unchanged.

- Soil or Tailings Incidental Ingestion/ Dermal Contact – The 2005 evaluation was for exposures current at the time of the evaluation and considered incidental contact of children (1 year old)

¹ URS. Final Molycorp Remedial Investigation Report, Revision 2. July 3, 2009. Prepared for Questa Mine, Chevron Mining Inc., Questa, New Mexico. (Final database included in Appendix 2.11-2)

or adults to the average concentration in tailings or surface soil measured for 4 times a week, 9 months a year, for many years. No adverse health effects were expected.

- ATSDR repeated the evaluation, considering all surface soil and tailings samples in the 2009 final RI database. ATSDR's previous conclusion remains unchanged.
- Surface Water Incidental Ingestion/ Dermal Contact – The 2005 evaluation was for exposures current at the time of the evaluation and considered incidental contact of older children (>6 years old) or adults to the average concentrations in surface water or seeps 4 times a week, 6 months a year, for many years. No doses were expected to result in health effects.
 - ATSDR repeated the evaluation, considering all surface water and seep samples in the 2009 final RI database. ATSDR's previous conclusion remains unchanged.
- Sediment Incidental Ingestion/ Dermal Contact – The 2005 evaluation was for exposures current at the time of the evaluation and considered incidental contact of older children (>6 years old) or adults to the average concentrations in sediment 4 times a week, 6 months a year, for many years. No doses were expected to result in health effects.
 - ATSDR repeated the evaluation, considering all sediment samples in the 2009 final RI database. ATSDR's previous conclusion remains unchanged.

In summary, the additional data included in the 2009 final RI database do not affect ATSDR's conclusions from the 2005 PHA. ATSDR's recommendations remain the same.

ATSDR also reviewed the final Record of Decision for the site². EPA's Record of Decision appears to thoroughly consider and address concerns with physical hazards and potential exposure pathways documented by ATSDR in the 2005 PHA.

Conclusion

Additional public health assessment activities by ATSDR do not appear to be needed at this time. However, ATSDR remains available to EPA and the community for consultation or technical assistance on public health questions related to the site.

² US Environmental Protection Agency. Record of Decision, Molycorp Inc., Questa, New Mexico. Dallas: US Environmental Protection Agency, Region 6. December 20, 2010.



Agency for Toxic Substances
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Atlanta GA 30333

September 20, 2011

Mr. Mark D. Purcell
Remedial Project Manager
Superfund Division (6SF-RL)
USEPA - Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Dear Mr. Purcell:

Thank you for the site documents and information you provided concerning the Molycorp site in Questa, New Mexico. The US Environmental Protection Agency (EPA) proposed this site for the National Priorities List (NPL) in May 2000 and repeated the proposal in March 2011. From the information you provided, we understand that EPA is planning to finalize the listing of this site and has repeated the 2000 proposal to include the significant amount of new data obtained through the remedial investigation.

As you know, the Agency for Toxic Substances and Diseases Registry (ATSDR) is mandated by Congress to conduct public health activities at all sites proposed for the NPL. ATSDR finalized a Public Health Assessment for the site in 2005. In light of the new proposal of the Molycorp site, we conducted an evaluation of additional information available and whether additional ATSDR activities are needed. This evaluation is included in the attached brief report.

On the basis of this evaluation, ATSDR does not anticipate conducting additional public health activities for the Molycorp site at this time. However, we remain available to EPA and the public for consultation or technical assistance on public health questions related to the site.

Please feel free to share this information with your colleagues and partners as appropriate. Thank you again for your assistance, and please do not hesitate to contact me if you have any questions or concerns. I can be reached at (770) 488-0768 or by email at azd9@cdc.gov.

Sincerely,

A handwritten signature in blue ink that reads "Jill J. Dyken".

Jill J. Dyken, PhD, PE
Environmental Health Scientist
Site and Radiological Assessment Branch
Division of Health Assessment and Consultation

cc:
Patrick Young, ATSDR/DRO Region 6