Cross-Reference of NMED NOD Comments and Revisions to the Technical Area 57 (aka Fenton Hill) Investigation Report

NMED NOD Comment No.	Summary of NOD Comment	Section(s) in Original Report	Section(s) in Revised Report	Nature of Revision
General Comments				
1	Organic chemicals of potential concern (COPCs) may be excluded only if sufficient evidence (e.g., analytical data, trend analysis) and justification are provided to demonstrate the contamination is not related to site activities and is from an off-site source. No response to this comment is necessary.	Section 5.1	n/a*	Comment noted.
2	The home ranges listed in these tables are not consistent with either the home ranges listed in 1993 U.S. Environmental Protection Agency (EPA) data or New Mexico Environment Department (NMED) guidance (Volume II). Clarify how the home ranges were derived and revise the report for consistency with NMED guidance.	Appendix G, Tables G-5.5-1 and G-5.5-4	n/a	The response to Comment 2 presents how the home ranges used in the report were developed from the 1993 EPA data. No revision to report is necessary.
3	For the vapor-intrusion calculations, the Johnson and Ettinger model appears to be applying an out of date inhalation reference concentration for trichloroethene. Revise the Johnson and Ettinger calculations accordingly.	Appendix G	Appendix G, Sections G-4.3-1 and G-4.3-2 Tables G-4.3-1, G-4.3-2, and G-4.3-3 Attachment G-2 (on CD), Johnson and Ettinger model spreadsheets for trichloroethene for Areas of Concern (AOCs) 57-006 and 57-007	The Johnson and Ettinger model spreadsheets for trichloroethene were revised to include the current reference concentration (RfC_i) of 0.002 mg/m^3. The Appendix G text and tables were revised to incorporate the updated results.

NMED NOD Comment No.	Summary of NOD Comment	Section(s) in Original Report	Section(s) in Revised Report	Nature of Revision
Specific Comments				
4	Clarify whether the Phase II Resource Conservation and Recovery Act facility investigation (RFI), voluntary corrective action (VCA), and ecological risk assessments have been conducted for the sites under investigation. In addition, during a site visit, NMED staff noticed that the Milagro Pond [AOC 57-004(b)], the fifth AOC, still contains water and has not been closed. The site needs to be investigated and remediated as necessary, and confirmatory samples must be collected to demonstrate corrective action is complete and the site poses no unacceptable risk to human health and the environment.	Section 1.1, p. 1	n/a	The response to Comment 4 clarifies that the Phase II RFI, VCA, and ecological risk assessment have not been conducted. No revision to report was necessary. The response to the comment notes that the decommissioning and confirmatory sampling at Milagro Pond discussed after the NMED site visit are currently being coordinated between the U.S. Department of Energy/National Nuclear Security Administration and the U.S. Forest Service. No revision to report is necessary.
5	It is not clear from the text whether the drainline from the trailer to the leach field that was located in 1994 was removed or left in place. Provide information on the depth at which the drainline was located to ensure samples collected from three depth intervals targeted the potential contamination beneath the drainline.	Section 6.3.3, p. 21	Section 6.3.4.1; Appendix B, Section B-9.0	The response to Comment 5 provides additional details on the depth of the former drainline and the sampling depths in relation to the depth of the drainline. The text and Appendix B have been revised to clarify the status of the drainline and the sampling depths.
6	An exposure interval of 0–5 ft below ground surface was used for ecological risk screenings. As a result of using the smaller exposure interval, risks were not estimated or were underestimated for numerous COPCs at AOCs 57-006 and 57-007. Revise the screening-level assessment to assess the correct exposure interval in accordance with the current NMED guidance.	Appendix G, Section G-2.3, p. G-2	n/a	NOD comment response explains that the exposure interval used in the report is consistent with the NMED-approved screening-level ecological risk assessment methods and has previously been used by Los Alamos National Labotarory and approved by NMED. No revision to report was necessary.

NMED NOD Comment No.	Summary of NOD Comment	Section(s) in Original Report	Section(s) in Revised Report	Nature of Revision
n/a	n/a	Throughout	Throughout	Minor editorial changes were made throughout the document for the sake of correctness and clarity.

*n/a = Not applicable.