

**Cross-Reference of NMED NOD Comments and Revisions to Lower Sandia Canyon Aggregate Area Investigation Report**

NMED NOD Comment No.	Summary of NOD Comment	Section(s)/Page(s) in Original Report	Section(s)/Page(s) in Revised Report	Nature of Revision
<b>General Comments</b>				
1	Revise Table 3.2-1 to add a column that includes corresponding locations proposed in the investigation work plan.	Section 3.2.4, Table 3.2-1	Table 3.2-1	Added column to Table 3.2-1 that crosswalks the investigation work plan proposed location identifiers with the actual sampling location identifiers.
2	Explain why proposed soil samples from 0–1 ft above the soil-tuff interface were not collected per the approved investigation work plan.	Section 6.3.3.4, p. 28	n/a*	No revisions to the investigation report are necessary. The 0–1 ft above the soil-tuff interface interval consisted of a soil-tuff mixture. These samples were identified as tuff. The sampled depth intervals do not constitute a deviation.
3	Explain why no soil samples were collected from above the soil-tuff interface per the approved investigation work plan.	Section 6.4.1.4, p. 32	Section 6.4.1.4 Section B-8.0	Added text describing the deviation from the approved investigation work plan. Revised text in section 6.4.1.4 to clarify no landfill boundaries or buried waste were located.
4	Clarify if the approved investigation work plan was followed and whether samples were collected from appropriate depths.	Section 6.8.1.4, p. 54	Section 6.8.4.1 Section 6.8.4.4 Section 9.1.1 Section B-8.0	Added text describing the deviation from the approved work plan. Revised sections in investigation report to state appropriate depths were not sampled, vertical extent at those locations not defined, and additional samples will be collected during Phase II investigation.
5	Further investigation of total petroleum hydrocarbons (TPH) is not necessary. No response required.	Section 7.2.4.4, p. 60	n/a	Comment noted.

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6	Explain why the text states extent was not defined at the site but inorganic and organic chemicals of potential concern (COPCs) were identified and risk determinations made.	Section 7.3.4.3, p. 63	Section 7.3.4.3 Section 7.3.4.4	Revised text to identify COPCs and deleted discussions of extent for barium and silver, which are not COPCs for the site.
7	Detected concentrations of TPH do not warrant additional investigations. No response required.	Section 7.3.4.4, p. 64	n/a	Comment noted.
8	Clarify if samples were collected at specified depths beneath the waste line or from the ground surface.	Section 7.4.4, p. 66	Section 7.4.4.1 Section 7.4.4.4 Section 9.1.2 Section B-8.0	Added text describing the deviation from the approved work plan. Revised sections in main text to state appropriate depths were not sampled, vertical extent is not defined, and a sample will be collected during Phase II investigation.
9	Correct typographical error (“reactivated” should be “deactivated”).	Section 7.7.4, p. 74	Section 7.7.4.1	Text in section 7.7.4.1 has been revised by changing “reactivated” to “deactivated.”
10	Cite the September 2005 revision of report instead of January 2004 version. Area of Concern (AOC) 53-008 does not qualify for corrective action complete status.	Section 7.9.4.4, pp. 81–84	Section 7.9.4.4 Section 11.1	Replaced January 2004 reference with reference to September 2005 revised report. Once vertical extent is defined at AOC 53-008, the potential chemical risk and radionuclide dose will be evaluated and presented in the Phase II investigation report.
11	Discuss why the proposed sampling location was moved and the samples were not collected from potentially contaminated location 53-612539 and explain the deviation from the approved investigation work plan.	Section 7.12.4	Section 7.12.4.1 Section 7.12.4.4 Section 9.1.2 Section B-8.0	Added text describing the deviation from the approved work plan. Revised sections in main text to state the drainline elbow was not sampled, vertical extent at the elbow not defined, and additional samples will be collected in Phase II.

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12	Propose to collect and analyze samples for TPH–diesel range organics (DRO) during Phase II investigation to determine extent of contamination.	Section 7.12.4.4, pp. 96–97	n/a	No revisions necessary. Data characterizing concentrations of volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), metals, polychlorinated biphenyls (PCBs), and other potential site contaminants are better suited to inform decisions about potential site cleanup than TPH-DRO data.
13	Resolve discrepancy between the text and Appendix C regarding the results of the x-ray fluorescence survey to identify locations with elevated lead at AOC 53-013. Clarify significance of grey and black circles in Attachment C-2 figures and provide legends.	Section 7.13.4.1 Attachment C-2	Section 7.13.4.1 Attachment C-2 figures	Revised first bullet in section to state elevated lead was detected at 14 locations, not 8. Revised both figures to include legends identifying features.
14	Retain arsenic as a COPC and revise risk screening to include arsenic.	Section 7.13.4.3, p. 99	Section 7.13.4.3 Section 7.13.4.4 Table H-10	Revised the quantile test comparing the upper quantile and performed slippage test, which indicated arsenic is not different from background and hence not a COPC. Revised statistical test results in Table H-10 and the main text. Deleted discussion of extent of arsenic in section 7.13.4.4.
15	Antimony contamination does not appear to be an issue. No response required.	Section 7.13.4.4, p. 100	n/a	Comment noted.
16	Revise text to remove reference to Module VIII of the permit and refer instead to Final Hazardous Waste Facility Permit, effective December 30, 2010.	Section 7.15.4, p. 103 Section 7.15.1	Section 7.15.1 Section 7.15.4	Revised text to state the solid waste management unit is listed in Attachment K-1 of the Laboratory's Hazardous Waste Facility Permit for tracking purposes only.

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17	PCBs must be retained as COPCs for risk evaluations, but additional sampling for extent of PCBs is not warranted. NMED disagrees that PCBs were not used at these sites and should not be considered COPCs or that detected PCBs likely reflect contamination from multiple upcanyon sources.	Section 9.1.1, p. 106	n/a	No revisions necessary. Risk-screening evaluations in the Sandia Canyon investigation showed no unacceptable human health or ecological risk from PCBs in the reaches bounding the Technical Area 20 sites.
18	Describe in detail the methods used to collect VOC samples so NMED can determine if VOC data provided in investigation report are acceptable.	Section B-5.3, p. B-4	Section B-5.3	Revised text to clarify that VOCs are collected immediately upon retrieval of core barrel or hand auger and then field screened. Remaining sampling material used for other analyses may be broken only as needed to fit into sample containers.
n/a	Miscellaneous	n/a	Figure H-16 Section 7.13.4.3	Revised caption of Figure H-16 to read, "Box plot for lead in tuff at AOC 53-013." Revised lead discussion to change statistical test performed from "quantile" to "Wilcoxon."

\*n/a = Not applicable.