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National Nuclear Security Administration
Los Alamos Site Office, MS A316
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Los Alamos, New Mexico 87544
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Date: December 21, 2007
Refer To: EP2007-0787

James P. Bearzi, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Submittal of the Response to Notice of Disapproval for the Investigation Work Plan for Middle Cañada del Buey Aggregate Area and Revision 1

Dear Mr. Bearzi:

Enclosed please find two hard copies with electronic files of the Response to the Notice of Disapproval for the Investigation Work Plan for Middle Cañada del Buey Aggregate Area as well as Revision 1 to the work plan and historical investigation report. Also enclosed is an electronic copy of a redline/strikeout version of the changes. A table detailing the revisions to the original work plan that cross-references the New Mexico Environment Department's comments is also included.

If you have any questions, please contact Dave McInroy at (505) 667-0819 (mcinroy@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (CRodriguez2@doeal.gov).

Sincerely,

Susan G. Stiger, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,

David R. Gregory, Project Director
Environmental Operations
Los Alamos Site Office

SS/DG/DM/PB/:sm

Enclosures: Two hard copies with electronic files:

- 1) Response to the Notice of Disapproval for the Investigation Work Plan for Middle Cañada del Buey Aggregate Area (EP2007-0787)
- 2) Investigation Work Plan for Middle Cañada del Buey Aggregate Area, Revision 1 (EP2007-0788)
- 3) Historical Investigation Report for Middle Cañada del Buey Aggregate Area, Revision 1 (EP2007-0789)
- 4) An electronic copy of the redline-strikeout version of the plan that includes all changes and edits to the plan
- 5) Cross-reference table of NMED comments

Cy: (w/enc.)
Cheryl Rodriguez, DOE-LASO, MS A316
Paula Bertino, EP-CAP, MS M992
RPF, MS M707 (with two CDs)
Public Reading Room, MS M992

Cy: (Letter and CD only)
Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-OB, White Rock, NM
Peggy Reneau, EP-WES, MS M992
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Cy: (w/o enc.)
Tom Skibitski, NMED-OB, Santa Fe, NM
Bonita Eichorst, DOE-LASO (date-stamped copy emailed)
Susan G. Stiger, ADEP, MS J591
Carolyn A. Mangeng, ADEP, MS J591
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IRM-RMMSO, MS A150

**Cross-Reference of NMED NOD Comments (November 26, 2007)
and Revisions to the Middle Cañada del Buey Aggregate Area Investigation Work Plan**

NMED NOD Comment No.	Investigation Work Plan Comment Reference	Page(s) in Revised (December 2007) Investigation Work Plan	Nature of Investigation Work Plan Revision
General Comments			
1	Units of measurement missing for data presented in Tables 2.6-2, 2.6-3, and 2.6-5 in the investigation work plan	Tables 2.6-2, 2.6-3, and 2.6-5, pp. 45 & 47, of investigation work plan; and Tables 2.3-2, 2.3-3, and 2.4-2, pp. 27 & 29, of HIR.	Tables 2.6-2, 2.6-3, and 2.6-5 in the investigation work plan and Tables 2.3-2, 2.3-3, and 2.4-2 of historical investigation report provided in Appendix B have been revised to include a footnote specifying the units of measurement as being milligrams per kilogram (mg/kg).
Specific Comments			
1	Section 4.1: Resolve the discrepancy between text and table regarding analyses for cyanide and nitrates. Include perchlorate and SVOC analyses.	Section 4.1, p. 16, and Table 4.1-1, p. 49, of investigation work plan	The text revised to indicate that all samples collected from AOCs 18-005(b) and 18-005(c) will be analyzed for cyanide and nitrates. In addition, LANL will analyze all samples collected from AOCs 18-005(b) and 18-005(c) for perchlorate and SVOCs to ensure the determination of nature and extent.
2	Section 4.2: Text states that the samples will be analyzed for SVOCs and tritium, but analytes not included in Table 4.2-1. Revise table to include tritium and SVOCs.	Table 4.2-1, p. 50, of investigation work plan	Table 4.2-1 revised to indicate that samples from AOC 51-001 will be analyzed for tritium and SVOCs.
3	Section 4.3: Add PCBs/pesticides to the analytical suite for AOC 54-007(d).	Sections 2.6.4 and 4.3, pp. 8 & 18, and Table 4.3-1, p. 51, of investigation work plan; Section 2.4.2, p. 5, of the HIR	Text in section 4.3 of the investigation work plan and Table 4.3-1 revised to indicate that samples will be analyzed for PCBs/pesticides. Text in section 2.6.4 of the investigation work plan and in section 2.4.2 of the HIR revised to describe historic pesticide/PCB screening data.
4	Include list of all fixed laboratory analytical methods to be used for various chemicals.	Table 5.2-1, p. 54, and text in section 5.2, p. 19, of investigation work plan	A new table summarizing the analytical methods for the various chemicals at each AOC provided as Table 5.2-1 in the IWP. Text in section 5.2 of the investigation work plan revised to reference new table.