



Environmental Programs
P.O. Box 1663, MS M991
Los Alamos, New Mexico 87544
(505) 606-2337/FAX (505) 665-1812

National Nuclear Security Administration
Los Alamos Site Office, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544
(505) 667-4255/FAX (505) 606-2132

FEB 29 2008

Date: February 29, 2008
Refer To: EP2008-0107

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 the Notice of Disapproval for the Investigation Work Plan for Upper Mortandad Canyon 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 Upper Mortandad Canyon Aggregate Area and Revision 1. Also enclosed is a redline-strikeout version of the work plan that includes all changes and edits identified in the response.

If you have any questions, please contact Kent Rich at (505) 665-4272 (krich@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (crodriguez2@doeal.gov).

Sincerely,

for 
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/KR:sm

- Enclosures: 1) Two hard copies with electronic files – Response to the Notice of Disapproval for the Investigation Work Plan for Upper Mortandad Canyon Aggregate Area (EP2008-0107)
- 2) Two hard copies with electronic files - Investigation Work Plan for Upper Mortandad Canyon Aggregate Area (EP2008-0108)
 - 3) An electronic copy of the redline-strikeout version of the plan that includes all changes and edits to the document
 - 4) Cross-reference table of NMED comments

Cy: (w/enc.)
Kent Rich, 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
David Davenport, LATA
Cheryl Rodriguez, DOE-LASO, MS A316
Peggy Reneau, EP-WES, MS M992
EP-CAP File, MS M992

Cy: (w/o enc.)
Tom Skibitski, NMED-OB, Santa Fe, NM
Bonita Eichorst, DOE-LASO (date-stamped letter emailed)
Susan G. Stiger, ADEP, MS M991
Carolyn A. Mangeng, ADEP, MS M991
Alison M. Dorries, EP-WES, MS M992
Dave McInroy, EP-CAP, MS M992
IRM-RMMSO, MS A150

Cross-Reference of NMED NOD Comments and Revisions to Upper Mortandad Canyon Aggregate Area Investigation Work Plan

NMED NOD Comment No.	Summary of NOD Comment Requirement	Section(s)/Page(s) in Original Report	Section(s)/Page(s) in Revised Report	Nature of Revision
General Comments				
1	Add PCB analyses for 20% of all samples	Sections 3.4.3, 3.5.3, 3.6.3, 3.12.3, 3.14.3, 3.15.3, 3.17.3, 5.3.3, 5.5.3, 5.6.3, 5.9.3, 5.10.3, 5.11.3, 5.12.3, 5.13.3, 6.8.3	Sections 3.4.3, 3.5.3, 3.6.3, 3.12.3, 3.14.3, 3.15.3, 3.17.3, 5.3.3, 5.5.3, 5.6.3, 5.9.3, 5.10.3, 5.11.3, 5.12.3, 5.13.3, 6.8.3, Tables 3.4-4, 3.5-5, 3.6-5, 3.12-5, 3.14-1, 3.15-5, 3.17-3, 5.3-5, 5.5-2, 5.6-4, 5.9-5, 5.10-3, 5.11-3, 5.12-3, 5.13-1, 6.8-4	Added PCB analyses for minimum of 20% of all proposed samples; revised text to include PCBs, revised corresponding proposed sampling tables.
2	Revise figures to show all pertinent site features	All figures except 1.0-1, 1.0-2, 2.1-1, 2.2-1, and 2.2-2	All figures except 1.0-1, 1.0-2, 2.1-1, 2.2-1, and 2.2-2	Revised figures to show structures, former structures, utilities, contour lines with marked elevations, etc.
3	Predetermine sampling locations and justify the selections based on geomorphic relationship and sedimentary packages	n/a*	Section 8.3.3	Sampling locations for sediment had been predetermined and placed on proposed sampling figures. Inserted text in section 8.3.3 to explain the method for selecting sediment sampling locations, clarified that if sediment locations need to be revised in the field (because of dynamic nature of sediment), changes will be documented as deviations from the plan.
4	Propose investigation activities for all sites or provide information demonstrating no releases	n/a	n/a	n/a
Specific Comments				
1	Resolve discrepancy in number of sites listed in Table 1.1-1 and in section 1.1	Section 1.1, Table 1.1-1	Section 1.1, Table 1.1-1	Text and table are correct, no revision is necessary
2	Provided documentation to support removal of PCB transformers	Section 3.2	Sections 3.2, 3.3, reference list	Added citation for progress report documenting transformer removals, added reference to reference list

NMED NOD Comment No.	Summary of NOD Comment Requirement	Section(s)/Page(s) in Original Report	Section(s)/Page(s) in Revised Report	Nature of Revision
3	Revise plan to propose sampling locations in vicinity of former transformers	Section 3.3.3	Section 3.3.3 Figure 3.16-3, Table 3.16-4	Added samples in vicinity of transformers
4	Include historical data for isotopic uranium and plutonium sampling of asphalt	Section 3.4.2	Sections 3.4.1 and 3.4.2	Added text clarifying that asphalt samples are screening-level; clarified sample locations shown on Figure 3.2-1; clarified sample depths and concentrations detected.
5	Provide rationale for selection of sample locations for dioxin/furan analyses	Section 3.4.3	Section 3.4.3	Provided rationale in NOD response; rationale for sample locations is in section 3.4.3.
6	Revise Plan to reflect correct number of previous sampling locations	Section 3.5.2	Section 3.5.2	Sampling location numbers are correct as stated in section 3.5.2; no revision necessary.
7	Revise plan to include investigation activities or provide additional information	Section 3.7.3	n/a	See NOD response.
8	Revise language to specifically state what components constitute the SMWU	Section 3.8	Section 3.8	Added text indicating SWMU is active floor drain and line connecting it to sanitary sewer system.
9	Revise plan to include investigation activities or provide additional information	Section 3.8.3	n/a	See NOD response
10	Revise plan to include investigation activities or provide additional information	Section 3.9.3	n/a	See NOD response
11	Revise section to more clearly define the SWMU, propose sampling	Section 3.10	Section 3.10	Revised text to clarify that SWMU consists of 25 active holding tanks
12	Revise plan to include investigation activities or provide additional information	Section 3.10.3	n/a	See NOD response
13	Clarify text to state whether system is active	Section 3.11	Section 3.11	Section 3.11 states that system is inactive; revised for clarity.

NMED NOD Comment No.	Summary of NOD Comment Requirement	Section(s)/Page(s) in Original Report	Section(s)/Page(s) in Revised Report	Nature of Revision
14	Revise to specifically state what components comprise the SWMU	Section 3.11	Section 3.11	Added text clarifying that SWMU includes vaults, tanks, and drainlines
15	Revise plan to include investigation activities or provide additional information	Section 3.11.3	n/a	See NOD response
16	Describe ancillary equipment associated with the system	Section 3.12	Section 3.12	SWMU consists of four underground tanks, as stated in Section 3.12. Text revised for clarity.
17	Revised Figure 3.4-1 to accurately depict location and present results	Section 3.12.2, Figure 3.4-1	Section 3.12.2, Figure 3.4-1	All results are nondetect and are not shown on Figure 3.4-1; text revised to clarify.
18	Revise figure 3.2-1 to show utilities if not shown; propose alternative sampling strategy	Section 3.12.3, Figure 3.2-1	Section 3.12.3, Figures 3.2-1 and 3.5-2, Table 3.12-5	Proposed sampling revised to include additional sample locations; figure shows utilities correctly.
19	Revise plan to include investigation activities or provide additional information	Section 3.13.3	n/a	See NOD response
20	Revise section to provide depth and dimensions of tank, justify sample depths, or revised depths	Section 3.14.3	Sections 3.14 and 3.14.3, Table 3.14-1	Text revised to add dimensions of tank; sample depth intervals revised.
21	Revise figure to clarify elevations	Section 3.14.3, Figure 3.14-1	Figure 3.14-1	Contour line elevations added to Figure 3.14-1
22	Correct typographical error	Section 3.15, Figure 3.15-1	Figure 3.15-1	Typographical error in Figure 3.15-1 corrected
23	Revise figure to depict location of pipe from influent source to discharge point	Figure 3.15-1	Figure 3.15-1	Location and orientation of pipe added to Figure 3.15-1
24	Add collection of two samples at outlet pipe's discharge point	Section 3.15	Section 3.15.3, Figure 3.15-1, Table 3.15-5.	Additional samples added at one location; text, figure, and table revised
25	Add potential storm drain overflow area to figure	Section 3.15, Figures 3.6-1, 3.6-2, 3.6-3, 3.15-1	Figures 3.6-1,3.6-2, 3.6-3, and 3.15-1	Figures revised to show potential storm drain overflow area

NMED NOD Comment No.	Summary of NOD Comment Requirement	Section(s)/Page(s) in Original Report	Section(s)/Page(s) in Revised Report	Nature of Revision
26	Include drainage sediment sampling, identify drainages on figure	Section 3.15, Figure 3.15-1	Section 3.15, Figure 3.15-1, Table 3.15-5	Added additional proposed samples in drainage; revised text in Section 3.15, revised Figure 3.15-1 to show drainages and additional proposed samples.
27	Revise figure to show location of outfall pipe from influent source to discharge point	Figure 3.15-1	Figure 3.15-1	Figure revised to show pipe paths
28	Show structure 03-0127 on figures	Figures 3.6-1, 3.6-2, 3.6-3, 3.15-1	Figures 3.3-1, 3.6-1, 3.6-2, 3.6-3, and 3.15-1	Figures revised to show former structure
29	Show drainages of figure, proposed sampling in drainage(s) for SMWU 03-049(a).	Section 3.15, Figure 3.15-1	Section 3.15, Figure 3.15-1.	Drainage samples were previously proposed; figure revised to show drainage.
30	Include at least one additional sample at lowest point of northern portion of outlined area in Figure 3.15-1	Section 3.15, Figure 3.15-1	Section 3.15.3, Figure 3.15-1.	Three additional sample locations added to text and Figure 3.15-1
31	Specifically identify sampling locations in the plan	Section 3.15.3	Sections 3.15.3 and 8.3.3, Figure 3.15-1	Sampling locations have been specifically identified; text revised to clarify
32	Specifically identify sampling locations in the plan	Section 3.16	n/a	Sampling locations have been specifically identified; no revision is necessary
33	Propose at least one sample below outfall discharge point	Section 3.17	Section 3.17, Figure 3.17-1, Table 3.17-3	Additional sample location added to text, Figure 3.17-1, and Table 3.17-3
34	Clarify or justify whether Mortandad Canyon samples will be used	Section 3.17	n/a	Mortandad Canyon samples will be used as applicable; none identified at this site. No revision is necessary.
35	Specifically identify sampling locations in the plan	Section 3.17.3	Section 3.17.3 and 8.3.3, Figure 3.17-1	Sampling locations have been specifically identified; text revised to clarify; text added to Section 8.3.3.
36	Revise plan to provide detailed figure showing manhole location, spill/overflow areas	Section 3.19	Figures 3.3-1, 3.16-1, 3.16-2, 3.18-1, and 3.18-2	Figures revised to show manhole and overflow areas

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37	Propose sample locations at manhole and spill release areas	Section 3.19.3	n/a	Area has been extensively remediated, manhole and waste line have been removed and soil excavated, sampling is not practicable. No revision is necessary.
38	Revise figure to show former structures	Figure 4.1-1	Figure 4.1-1	Revised figure to show former structures
39	Include americium-241 in analyses; include sampling in drainage downstream from septic system; clarify sampling intervals relative to fill	Section 4.2.3	Section 4.2.3, Figure 4.2-3, Table 4.2-4	Added americium to analyses (text in Section 4.2.3, Table 4.2-4); two additional drainage sample locations added below former septic system; revised text to clarify sample depth intervals, rationale.
40	Propose surface samples for AOC 48-001 to determine whether threat to human health or environment exists	Section 5.2.3	Section 5.2.3	Revised text to indicate that all surface samples from all TA-48 SWMUs and AOCs will be used to evaluate potential contaminants from air releases at AOC 48-001.
41	Add two sample locations and revise figure	Section 5.5.3, Figure 5.5-1	Section 5.5.3, Figure 5.5-1, Table 5.5-2	Revised text in section 5.5.3, added two locations to Figure 5.5-1
42	Revise plan to include investigation activities or provide additional information	Section 5.7.3	n/a	See NOD response
43	Revise plan to include investigation activities or provide additional information	Section 5.8.3	Section 5.8.3, Figure 5.11-1, Table 5.11-3	Revised text in section 5.8.3; added additional samples below outfall.
44	Include drainage sampling	Section 5.9.3	Section 5.9.3, Figure 5.9-4	Revised text to clarify Mortandad Canyon samples will be used as applicable; revised Figure 5.9-4 to show Mortandad Canyon locations.
45	Include drainage sampling; revise figures to show features	Section 5.10.3	Section 5.10.3, Figure 5.10-1	Revised text to clarify that Mortandad Canyon samples will be used as applicable; Revised Figure 5.10-1 to show pertinent features.

NMED NOD Comment No.	Summary of NOD Comment Requirement	Section(s)/Page(s) in Original Report	Section(s)/Page(s) in Revised Report	Nature of Revision
46	Include drainage sampling; revise figures to show features	Section 5.11.3	Section 5.11.3, Figure 5.11-1	Revised text to clarify that Mortandad Canyon samples will be used as applicable; Revised Figure 5.11-1 to show pertinent features.
47	Include drainage sampling; revise figures to show features	Section 5.12.3	Section 5.12.3, Figure 5.12-1	Revised text to clarify that Mortandad Canyon samples will be used as applicable; Revised Figure 5.12-1 to show pertinent features.
48	Resolve discrepancy regarding analysis for PCBs	Section 5.13.3	Section 5.13.3	Revised text to indicate that 20% of samples will be analyzed for PCBs
49	Ensure sample locations are outside perimeter of former excavation; add intervals where screening or staining/odor indicate contamination	Section 5.14.3	Section 5.14.3, Figure 5.14-1	Revised text to indicate sample locations will be outside excavation perimeter, and sample intervals will be added if screening or field observations warrant; revised Figure 5.14-1 to indicate locations outside perimeter.
50	Provide documentation that waste lines did not leak and are not currently leaking	Section 6.3	n/a	See NOD response.
51	Revise plan to include investigation activities or provide additional information	Section 6.4.3	Section 6.4.3	Text corrected in Section 6.4.3. See also NOD response.
52	Revise plan to include investigation activities or provide additional information	Section 6.6.3	n/a	See NOD response
53	Revise figures to include waste line numbers, SWMU numbers, location of vault, and direction of flow	Figure 6.8-1	Figure 6.8-1	Figure revised to show requested features
54	Include explanation of how sampling locations selected	Section 6.9.3	Section 6.9.3	Text added to Section 6.9.3 explaining rationale for sampling location selection.
55	Revise figure to correctly identify areas that are part of SWMU 50-006(c)	Figure 6.2-1	Figure 6.2-1	Revised SWMU boundary to include all potential surface soil contamination resulting from SMWU 50-006(c)

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56	Revise text to reference SWMU 50-006(c), not 50-004(c)	Section 6.10.2	Section 6.10.2	Corrected typographical error.
57	Revise plan to include investigation activities or provide additional information	Section 6.10.3	Section 6.10.3	Revised text to indicate that all TA-50 surface soil sample data will be used as applicable to evaluate SWMU 50-006(c)
58	Include explanation of how sampling locations selected	Section 6.11.3	Section 6.11.3	Added text to section 6.11.3 explaining rationale for sampling location selection
59	Revise plan to include investigation activities or provide additional information	Section 6.15.3	n/a	See NOD response
60	Revise plan to include investigation activities or provide additional information	Section 6.16.3	n/a	See NOD response
61	Revise plan to include investigation activities or provide additional information	Section 6.17.3	n/a	See NOD response
62	Revise plan to include investigation activities or provide additional information	Section 7.2	n/a	See NOD response
63	Correct typographical error in table title	Table 3.4-1	Table 3.4-4	Corrected table title to Table 3.4-4
64	Resolve discrepancy in media codes	Table 3.12-1	Figures 3.4-2 and 3.5-1, Tables 3.12-1, 3.12-2, 3.12-3, and 3.12-4	Corrected media code text

*n/a = Not applicable.