

Environmental Programs
P.O. Box 1663, MS M991
Los Alamos, New Mexico 87545
(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

Date: July 25, 2008 Refer To: EP2008-0387

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 Sandia 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 Sandia Canyon Aggregate Area and Revision 1 of the work plan. Also enclosed is an electronic copy of a redline/strikeout version of the work plan that includes all changes made in response to the New Mexico Environment's (NMED's) notice of disapproval. A table detailing where revisions have been made to the work plan with cross-references to NMED's numbered comments is also included.

If you have any questions, please contact Kent Rich at (505) 665-4272 (krich@lanl.gov) or Cheryl Rodriguez at (505) 845-5804 (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/KR:sm

Enclosures: Two hard copies with electronic files:

- 1) Response to the Notice of Disapproval for the Investigation Work Plan for Upper Sandia Canyon Aggregate Area (EP2008-0387)
- 2) Investigation Work Plan for Upper Sandia Canyon Aggregate Area, Revision 1 (EP2008-0388)
- 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)

Kim Birdsall, North Wind Cheryl Rodriguez, DOE-LASO, MS A316 Laurie King, EPA Region 6, Dallas, TX Steve Yanicak, NMED-OB, White Rock, NM Kristine Smeltz, EP-WES, MS M992 EP-CAP File, MS M992

## Cy: (w/o enc.)

Tom Skibitski, NMED-OB, Santa Fe, NM Alison Bennett, DOE-LASO (date-stamped letter emailed) Susan G. Stiger, ADEP, MS M991 Alison M. Dorries, EP-WES, MS M992 Dave McInroy, EP-CAP, MS M992 IRM-RMMSO, MS A150 (date-stamped letter emailed)

# Cross-Reference of NMED NOD Comments and Revisions to Upper Sandia 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 Co	mments		*	
1	20% of all samples must be sent for off- site laboratory analysis of polychlorinated biphenyls (PCBs).	Table 4.0-1	Table 4.0-1	Proposed sampling table has been revised to include PCB analyses for at least 20% of all samples.
2	Figures must include pertinent features and structures.	Figures 4.1-1, 4.1-2, 4.1-3, 4.1-4, 4.1-5, 4.1-12, 4.1-17, 4.1-22, 4.1-24, 4.1-28, 4.1-33, 4.1-39, 4.1-43, 4.1-48, 4.1-53, 4.1-55, 4.1-56, 4.1-57, 4.2-1, 4.2-2, 4.2-3, 4.2-4, 4.2-5, 4.2-9, 4.2-14, 4.2-19, and 4.3-2	Figures 4.1-1, 4.1-2, 4.1-3, 4.1-4, 4.1-5, 4.1-12, 4.1-17, 4.1-22, 4.1-24, 4.1-28, 4.1-33, 4.1-39, 4.1-43, 4.1-48, 4.1-53, 4.1-55, 4.1-56, 4.1-57, 4.2-1, 4.2-2, 4.2-3, 4.2-4, 4.2-5, 4.2-9, 4.2-14, 4.2-19, and 4.3-2	The figures have been revised to include pertinent site features and structures, including underground utilities, structure numbers, contour lines, canyon names, and existing well and borehole locations.
3	The Permittees are required to sample drainage(s) associated with the site and identify these drainages on associated figures.	Sections 4.1.7.1, 4.1.7.3, 4.1.7.10, 4.1.13.3, 4.1.13.5, 4.1.20, 4.1.30, 4.1.31, 4.1.37, and 4.2.7. Figures 4.1-12, 4.1-17, 4.1-22, 4.1-24, 4.1-28, 4.1-33, 4.1-39, 4.1-48, 4.2-5, 4.2-9, 4.2-14, and 4.2-19	Sections 4.1.7.1, 4.1.7.3, 4.1.7.10, 4.1.13.3, 4.1.13.5, 4.1.20, 4.1.30, 4.1.31, 4.1.37, and 4.2.7. Section 5.3.3 Excavation has been renumbered to Section 5.3.4. A new section 5.3.3, Sediment Samples, has been added. Figures 4.1-12, 4.1-17, 4.1-22, 4.1-24, 4.1-28, 4.1-33, 4.1-39, 4.1-48, 4.2-5, 4.2-9, 4.2-14, and 4.2-19	Drainage and sediment sampling locations have been identified on proposed sampling figures for sites where drainage and sediment sampling is required. Text has been added to Proposed Activities sections for sites where drainage and sediment sampling is required. Text regarding the collection of sediment samples has also been added to section 5.3.
4	The Permittees must indicate proposed and existing sampling locations in canyons on the relevant figures.	Sections 4.1.7.1, 4.1.7.3, 4.1.7.10, 4.1.13.3, 4.1.3.5, 4.1.20, 4.1.30, 4.1.31, 4.1.37, and 4.2.7. Figures 4.1-12, 4.1-17, 4.1-22, 4.1-24, 4.1-28, 4.1-33, 4.1-39, 4.1-48, 4.2-5, 4.2-9, 4.2-14, and 4.2-19	Sections 4.1.7.1, 4.1.7.3, 4.1.7.10, 4.1.13.3, 4.1.13.5, 4.1.20, 4.1.30, 4.1.31, 4.1.37, and 4.2.7. Figures 4.1-12, 4.1-17, 4.1-22, 4.1-24, 4.1-28, 4.1-33, 4.1-39, 4.1-48, 4.2-5, 4.2-9, 4.2-14, and 4.2-19	Work plan figures and corresponding text have been revised to include proposed and existing canyon sampling locations.

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
5	The Permittees must revise the figures to depict the location of the outfall pipes from the influent source to the discharge point.	Figures 4.1-33, 4.1-39, 4.1-43, 4.1-48, 4.1-53, 4.1-56, 4.1-57, and 4.2-9	Figures 4.1-33, 4.1-39, 4.1-43, 4.1-48, 4.1-53, 4.1-56, 4.1-57, and 4.2-9	Figures showing outfalls that discharged to drainages and canyons have been revised to include drainline locations and orientation from the influent source to the discharge point.
6	Figures must be revised to show the boundaries of the entire SWMUs/AOCs.	Figures 4.1-17, 4.1-53, 4.1-56, and 4.1-57	Figures 4.1-17, 4.1-53, 4.1-56, and 4.1-57	The small triangles on the figures denote outfall discharge points associated with certain AOCs and SWMUs. Drainlines from the influent source to the outfall discharge points have been added to figures to assist in determining if proposed sampling locations are adequate to define the nature and extent of contamination.
Specific Co	mments			
1	The Permittees must collect samples from two additional locations at two depths (0–1 ft and 1–2 ft) under the concrete pad and must ensure that the concrete chip samples are collected from the original concrete rather than from the concrete that was added to the pad.	Section 4.1.3, Figure 4.1-12, and Table 4.0-1	Section 4.1.3, Figure 4.1-12, and Table 4.0-1	Text, figure, and table have been revised to indicate that soil samples will be collected from two depth intervals at two additional locations under the concrete pad and to note that the chip samples will be collected from the old pad.
2	The Permittees must address any potential PCB contamination beneath the new concrete pad at the time of demolition of the building.	Section 4.1.4	Section 4.1.4	Text has been revised to indicate that any potential PCB contamination beneath the new concrete pad will be addressed after building 03-0066 is demolished.
3	For SWMU 03-009(a), the Permittees must indicate proposed and existing sampling locations in canyons on the relevant figures.	Section 4.1.7.1 and Figure 4.1-5	Section 4.1.7.1 and Figure 4.1-5	The text has been revised to reference the canyon reach sediment sampling locations and to clarify that these data will be assessed in the Upper Sandia Canyon Aggregate Area investigation report. The corresponding figure has been revised to show relevant canyon reach and canyon sediment sampling locations.

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
4	Text of Section 4.1.7.2, Figure 4.1-2, and Table 4.1-1 are inconsistent.	Section 4.1.7.2, Figures 4.1-1 through 4.1-5, and Table 4.1-1	Section 4.1.7.2, Figures 4.1-1 through 4.1-5, and Table 4.1-1	Table 4.1-1 is correct. Figures 4.1-1 through 4.1-5 were revised to be consistent with the table.
4	The Permittees must provide information on how the pond discharged to the outfall 03-045(g) and indicate proposed sampling along the drainage path.	Section 4.1.7.2, Figure 4.1-5, and Table 4.0-1	Section 4.1.7.10, Figure 4.1-5, and Table 4.0-1	Information on how the pond discharged to the outfall 03-045(g) is provided in this response, and the text of the work plan has been revised accordingly. In addition, section 4.1.7.10, Figure 4.1-5, and Table 4.0-1 have been revised to include an additional sampling location along the drainage path at the inlet of SWMU 03-045(g).
5	For SWMU 03-029, the Permittees must indicate proposed and existing sampling locations in canyons on the relevant figures.	Section 4.1.7.3, Figure 4.1-22, and Table 4.0-1	Section 4.1.7.3, Figure 4.1-22, and Table 4.0-1	The text, figure, and table have been revised to include two additional sampling locations. The text has also been revised to reference the canyon reach sediment sampling locations and to clarify that these data will be assessed in the Upper Sandia Canyon Aggregate Area investigation report. The corresponding figure and table have been revised to show relevant canyon reach and canyon sediment sampling locations.
6	Section 4.1.7.4 and Table 4.1-1 are inconsistent.	Section 4.1.7.4 and Table 4.1-1	Section 4.1.7.4 and Table 4.1-1	The table is correct. The text has been revised accordingly.
7	Section 4.1.7.7, Figure 4.1-2, and Table 4.1-1 are inconsistent.	Section 4.1.7.7, Figures 4.1-1 through 4.1-5, and Table 4.1-1	Section 4.1.7.7, Figures 4.1-1 through 4.1-5, and Table 4.1-1	The text, figures, and table have been revised to be consistent.
7	The Permittees must collect samples underneath the former aboveground tank [AOC 03-043(b)] to define nature and extent.	Figures 4.1-1 through 4.1-5	Figures 4.1-1 through 4.1-5	The location of AOC 03-043(b) was incorrect in Figures 4.1-1 through 4.1-5. The revised location of AOC 03-043(b) and corresponding sampling results confirm the nature and extent of contamination have been defined for this site. No additional sampling is needed.

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
8	The Permittees must provide documentation supporting the assertion that AOCs 03-043(d) and 03-043(h) are duplicate sites of SWMU 03-036(a).	Sections 4.1.7.8 and 4.1.7.9	Sections 4.1.7.8 and 4.1.7.9	Supporting documentation is included with this response. Text has been revised to provide the rationale demonstrating that AOCs 03-043(d) and 03-043(h) are the same areas of potential soil contamination as SWMU 03-036(a).
9	The Permittees must collect samples from underneath the waste water treatment plant (WWTP) structures at their time of demolition to address any potential contamination beneath the structures.	Section 4.1.13	Section 4.1.13	Samples will be collected beneath existing structures associated with SWMUs 03-014(a,b,c,d,e,g,h,i,p) after the demolition of WWTP structures. The text has been revised accordingly.
10	For SWMU 03-014(b2), the Permittees must indicate proposed and existing sampling locations in canyons in the relevant figures.	Section 4.1.13.3 and Figure 4.1-48	Section 4.1.13.3 and Figure 4.1-48	The text has been revised to reference the canyon reach sediment sampling locations and to clarify that these data will be assessed in the Upper Sandia Canyon Aggregate Area investigation report. The corresponding figure has been revised to show relevant canyon reach and canyon sediment sampling locations.
11	For SWMU 03-014(c2), the Permittees must indicate proposed and existing sampling locations in canyons on the relevant figures.	Section 4.1.13.5, Figure 4.1-48, and Table 4.0-1	Section 4.1.13.5, Figure 4.1-48, and Table 4.0-1	The text, figure, and table have been revised to include one additional sampling location. The text has also been revised to reference the canyon reach sediment sampling locations and to clarify that this data will be assessed in the Upper Sandia Canyon Aggregate Area investigation report. The corresponding figure has been revised to show relevant canyon reach and canyon sediment sampling locations.
12	Section 4.1.13.9 and Figure 4.1-44 are inconsistent.	Section 4.1.13.9 and Figure 4.1-44	Section 4.1.13.9 and Figure 4.1-44	The figure is correct and the text has been revised accordingly.
13	Section 4.1.13.12 and Table 4.0-1 are inconsistent.	Section 4.1.13.12 and Table 4.0-1	Section 4.1.13.12 and Table 4.0-1	The text is correct and the table has been revised accordingly.

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14	The Permittees must include analysis of tritium and strontium-90 for the 16 samples that will be collected around the beds to define the vertical and lateral extent of contamination	Section 4.1.13.17 and Table 4.0-1	Section 4.1.13.17 and Table 4.0-1	The text and table have been revised to specify that the 16 samples will be analyzed for tritium and strontium-90.
15	The Permittees must investigate the drainlines that carried effluent from the sludge beds to the holding tanks.	Section 4.1.13.19, Figure 4.1-48, and Table 4.0-1	Section 4.1.13.19, Figure 4.1-48, and Table 4.0-1	The text, figure, and table have been revised to include one additional sampling location beneath the drainline that carried effluent from the sludge beds to the holding tanks.
15	For SWMU 03-014(u), the Permittees must indicate proposed and existing sampling locations in canyons on the relevant figures.	Section 4.1.13.19, Figure 4.1-48, and Table 4.0-1	Section 4.1.13.19, Figure 4.1-48, and Table 4.0-1	The text has been revised to reference the canyon reach sediment sampling locations and to clarify that these data will be assessed in the Upper Sandia Canyon Aggregate Area investigation report. The corresponding figure has been revised to show relevant canyon reach and canyon sediment sampling locations.
16	Potential PCB contamination beneath the building 03-0035 must be investigated at the time of decommissioning and demolition of the building.	Section 4.1.17	Section 4.1.17	The text has been revised to state that potential contamination beneath building 03-0035 will be investigated after the building undergoes demolition and decommissioning.
17	The Permittees must collect samples beneath the former drainlines that carried effluent from building 03-0141 to the outfall.	Section 4.1.18.1, Figure 4.1-12, and Table 4.0-1	Section 4.1.18.1, Figure 4.1-12, and Table 4.0-1	The text, figure, and table have been revised to add a sampling location beneath the former drainline.
17	For SWMU 03-015, the Permittees must indicate proposed and existing sampling locations in canyons on the relevant figures.	Sections 4.1.18.1 and 4.1.18.2, Figure 4.1-12, and Table 4.0-1	Sections 4.1.18.1 and 4.1.18.2, Figure 4.1-12, and Table 4.0-1	The text, figures, and table have been revised to add samples in the drainage associated with SWMU 03-015 and AOC 03-053.

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18	The Permittees must collect samples from depths of 4 ft, 10 ft, and 20 ft at historical sampling location 03-22533 instead of at depths of 17-18 ft and 19-20 ft. All samples must be analyzed for the suite proposed in Table 4.0-1.	Section 4.1.19 and Table 4.0-1	Section 4.1.19 and Table 4.0-1	The text and table have been revised accordingly.
19	For SWMU 03-021, the Permittees must indicate proposed and existing sampling locations in canyons on the relevant figures.	Section 4,1,20 and Figure 4.1-28	Section 4.1.20 and Figure 4.1-28	The text has been revised to reference the canyon reach sediment sampling locations and to clarify that these data will be assessed in the Upper Sandia Canyon Aggregate Area investigation report. The corresponding figure has been revised to show relevant canyon reach and canyon sediment sampling locations.
19	Correct the typographical error for the historical sampling location for 03-03331.	Section 4.1.20	Section 4.1.20	The typographical error has been corrected.
20	Figure 4.1-52 depicts SWMU 03-038(c), not Figure 4.1-51; revise the text accordingly.	Section 4.1.24	Section 4.1.24	The figure callout has been corrected in the text.
20	The Permittees must revise the figure to depict the location of the drainline from its influent source to the discharge point.	Figure 4.1-52	Figure 4.1-53	Figure 4.1-53 has been revised to show the location of the former drainline that carried rinse solutions to the industrial waste line.
20	The Permittees must collect samples from the location where the former draintine discharged to the industrial waste line.	Section 4.1.24, Figure 4.1-53, and Table 4.0-1	Section 4.1.24, Figure 4.1-53, and Table 4.0-1	The text, figure, and table have been revised to include an additional sampling location.
21	The Permittees must provide information on the nature of the waste that was discharged through the drainlines and ensure that samples are analyzed for all potential chemicals of potential concern, including radionuclides.	Section 4.1.25 and Table 4.0-1	Section 4.1.25 and Table 4.0-1	Building 03-0032 is the Center for Materials Science, and building 03-0034 is the Cryogenics Building "B." Information about the types of waste that were generated in the buildings and discharged to the industrial waste lines is not available. The table has been revised to include additional analyses.

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21	Samples must also be collected from both locations where the former drainline exited building 03-0034.	Section 4.1.25, Figure 4.1-55, and Table 4.0-1	Section 4.1.25, Figure 4.1-55, and Table 4.0-1	The text, figure, and table have been revised to include a second sampling location where the former drainline exited the building.
22	Section title and text are inconsistent.	Section 4.1.26	Section 4.1.26	The section title is correct. The text has been revised accordingly.
23	The Permittees must provide documentation to support the assertion that SWMUs 03-043(f) and 03-043(g) are duplicates of SWMUs 03-036(c) and 03-036(d).	Sections 4.1.27 and 4.1.28	Sections 4.1.27 and 4.1.28	Supporting documentation is included with this response. The text has been revised to provide the rationale demonstrating that AOCs 03-043(f) and 03-043(g) are the same areas of potential soil contamination as SWMUs 03-036(c) and 03-036(d).
24	The Permittees must collect samples from the location where the drainline exited the oil pump house (structure 03-0057). The samples must be collected at two depths and analyzed for the same analytical suite as proposed in Table 4.0-1 for SWMU 03-045(e).	Section 4.1.30, Figure 4.1-24, and Table 4.0-1	Section 4.1.30, Figure 4.1-24, and Table 4.0-1	The close proximity of the diesel fuel storage tanks and associated fuel lines and other ancillary equipment for the steam plant makes collecting samples not possible at this time. However, LANL will investigate the drainline and area beneath the pump house after the demolition and decommissioning of the pump house. The text, figure and table have been changed to reflect this information.
25	The Permittees must indicate the orientation of the outfall pipe on Figure 4.1-13 and show the location of the drainpipe that carried effluent from the outfall pipe.	Section 4.1.32 and Figures 4.1-13 and 4.1-17	Section 4.1.32 and Figure 4.1-17	Figure 4.1-13 was not changed. Figure 4.1-17 has been revised to show the orientation of the outfall pipe and to depict the location of the drainpipe.
25	Samples must be collected at the location where the outfall pipe exited the building and from beneath the location of the outfall pipe.	Figure 4.1-17 and Table 4.0-1	Figure 4.1-17 and Table 4.0-1	The figure and table have been revised to show a location where a sample will be collected under the Upper Mortandad 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
26	The Permittees must ensure that samples are collected from soil/tuff underneath the clean backfill to define the vertical extent of contamination.	Section 4.1.36 and Table 4.0-1	Section 4.1.36 and Table 4.0-1	To ensure investigation samples are collected from soil/tuff beneath the clean backfill placed in the two excavated areas adjacent to building 03-0141, text and table have been revised to indicate that samples will be collected from the depths below the clean backfill.
27	For SWMU 03-052(b), the Permittees must indicate proposed and existing sampling locations in the drainage(s).	Section 4.1.37, Figure 4.1-17, and Table 4.0-1	Section 4.1.37, Figure 4.1-17, and Table 4.0-1	The figure has been revised to show the drainage below SWMU 03-052(b). In addition, two new sampling locations have been added in the stormwater collection area to the northeast across Eniwetok Drive. The text and table have been revised to include the new sampling locations.
28	The boundary for the entire SWMU must be shown in the figure.	Figures 4.1-56 and 4.1-57	Figures 4.1-39, 4.1-56, and 4.1-57	The figures have been revised to show the correct SWMU boundary. In addition, the associated drainlines have been added to the figures.
28	Since the locations of samples collected in 2004 are not shown in the figure, it is not clear if any samples were collected at or near the outfall. Samples must be collected at the outfall location to define the nature and extent of contamination.	Section 4.1.38 and Figures 4.1-39, 4.1-56, and 4.1-57	Section 4.1.38 and Figures 4.1-39, 4.1-56, and 4.1-57	The text has been revised to clarify that SWMU 03-052(f) was the ultimate outfall for this drain system. Sampling is being proposed at SWMU 03-052(f) (see Figure 4.1-39).
28	Drainage from the outfall must be clearly indicated on the figure and sampled. The Permittees must collect samples along the entire length of the drainage.	Figures 4.1-39	Figures 4.1-39	The figure has been revised to show the drainage below the outfall at SWMU 03-052(f). In addition, sampling locations in the drainage are shown on the figure.
29	The nature and extent of contamination has not been defined for this site. NMED acknowledges that the site is inaccessible at this time; therefore, it must be investigated at the time of demolition and decommissioning of the new building (structure 03-1400).	Section 4.1.41	Section 4.1.41	The text has been revised to add that sampling will be done after the demolition and decommissioning of building 03-1400.

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
30	The Permittees must include tritium analysis in the analytical suite proposed for all samples to be collected at SWMU 03-059.	Section 4.1.44.2 and Table 4.0-1	Section 4.1.44.2 and Table 4.0-1	The text and table have been revised to include tritium analysis.
31	AOC C-03-022 has never been sampled. The Permittees must collect samples from the location of former tanker trailer to confirm that no releases from the tanker occurred. The Permittees must propose collecting samples from two depths for analyses of metals and DRO.	Section 4.1-45, Figure 4.1-5, and Table 4.0-1	Section 4.1-45, Figure 4.1-5 , and Table 4.0-1	Text, figure, and table have been revised to specify sampling for AOC C-03-022.
32	Text in section 4.2.1, Figures 4.2-7 and 4.2-8, and Table 4.2-1 are inconsistent.	Section 4.2.1, Figures 4.2-7 and 4.2-8, and Table 4.2-1	Section 4.2-1	Figures and table are correct. The text has been revised to be consistent with figures and table.
33	SWMU 60-004(d) is shown in Figure 4.2-10, not Figure 4.2-9, as stated in the text. Correct the typographical error.	Section 4.2.2	Section 4.2.2	The text has been revised to specify the correct figure.
34	Revise the figure to indicate location of the Pads 2 and 3.	Figures 4.2-1 through 4.2-5	Figures 4.2-1 through 4.2-5	Figures have been revised to depict former storage Pads 2 and 3.
34	Mercury was detected above BV in four tuff samples, not three as stated (i.e., from locations 60-01330, 60-01331, 60-01332, and 60-01335). Revise the text accordingly.	Section 4.2.4	Section 4.2.4	Text has been revised to indicate that mercury was detected above its background value in four tuff samples.
34	Tritium analysis must be included for all samples collected at AOC 60-004(f).	Table 4.0-1	Table 4.0-1	Table 4.0-1 has been revised to include tritium for all samples collected at AOC 60-004(f).
35	Revise the text and Table 4.0-1 to include analysis of radionuclides, nitrate, and perchlorate for samples to be collected from the seepage pit.	Section 4.2.5 and Table 4.0-1	Section 4.2.5 and Table 4.0-1	Text and table have been revised to include specified analyses.
36	Revise text to agree with Tables 4.2-5 through 4.2-7.	Section 4.2.7	Section 4.2.7	Revise text to indicate that tables present screening level data rather than decision level data.

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
36	The Permittees must revise the figures to indicate the drainages associated with the site. The Permittees must collect samples along the entire length of the drainage.	Figure 4.2-19	Figure 4.2-19	Figures has been revised to show the entire length of the drainage below SWMU 60-007(b) and canyon reach sediment sampling locations in the canyon below the site. The canyon slope between the mesa top and canyon bottom is inaccessible for sample collection. However, a sampling location has been moved to the toe of the slope.
37	Incorrect reference is made to no further action (NFA) for AOCs 03-003(m), 03-052(d), 03-056(b), and 60-001(a). Make the appropriate revisions to the table and include the references in section 8.1.	Section 8.1 and Table 1.1-1	Section 8.1 and Table 1.1-1	The correct reference is "EPA 2003, 078142." Table has been revised to include the correct reference, which has been added to section 8.1, References, of the work plan.
37	Incorrect reference to NFA is made for SWMUs 03-024 and 03-045(d). Make the appropriate revisions to the table, and include the references in section 8.1.	Section 8.1 and Table 1.1-1	Section 8.1 and Table 1.1-1	The table has been revised to include the correct reference "NMED 1997, 059358," which has been added to section 8.1, References, of the work plan.
38	Figure 4.1-2 and Table 4.1-1 are inconsistent.	Figure 4.1-2 and Table 4.1-1	Figure 4.1-2 and Table 4.1-1	The figure is correct. The table has been revised accordingly.
39	The caption for the Table 4.1-3 is incorrect. The table presents data for TA-03 sites, not TA-60 sites. Correct the typographical error.	Table 4.1-3	Table 4.1-3	The caption for Table 4.1-3 has been corrected.