Cross-Reference of NMED NOD Comments and Revisions to the Investigation Report for Ancho, Chaquehui, and Indio Canyons

NMED NOD Comment No.	Summary of NOD Comment Requirement	Section(s) in Original Report	Section(s) in Revised Report	Nature of Revision
1	Provide maps and tables presenting results for chemicals of potential concern (COPCs), and include a "Samples Collected and Analyses Requested" table.	n/a*	Sections 6.2, 6.2.1, 6.3, 6.4, and 7.1.1; Tables 6.2-1, 6.2-2, 6.2-3, 6.2-4, 6.3-1, and 6.4-1; Figure 7.1-6	Figure 7.1-6 is a map showing the spatial distribution of detected inorganic COPCs in reach AN-4, which is the only reach and COPC suite with sediment concentrations greater than human health residential risk screening values. Tables 6.2-2, 6.2-3, and 6.2-4 show concentrations of all COPCs in each sample, and Table 6.2-2 includes nondetected results for inorganic chemicals above sediment background values. Tables 6.2-1, 6.3-1, and 6.4-1 present samples collected and analyses performed for sediment, nonstorm-related surface water, and stormwater, respectively.
2	Amend the report to include analytical data for dioxins and furans in canyon sediments, or propose in a separate work plan collection and analysis of such samples.	n/a	n/a	The Laboratory will prepare a separate work plan to address potential dioxin and furan contamination in sediment investigation reaches downcanyon from potential sources.
3	Clarify whether analytical results speciate mercury.	n/a	n/a	Per the New Mexico Environment Department (NMED) approved work plan, analytical results did not speciate mercury or other inorganic chemicals. No revision is required.
4	Clarify whether analytical results speciate chromium and determine whether screening levels for chromium III or chromium VI should be used in the risk assessment.	n/a	n/a	Per the NMED-approved work plan, analytical results did not speciate chromium. There are no human health screening values for total chromium, and chromium VI screening values were used as conservative estimates of effects of total chromium. No revision is required.

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5	Describe all explosives included in the analyses, and justify the inclusion or exclusion of specific explosive compounds in the analyses.	n/a	Appendix C; Tables C-2.0-4 and C-2.0-5	Sample results were obtained for all explosive compounds specified in Table III-1 of the Compliance Order on Consent. Tables C-2.0-4 and C-2.0-5, which have been added to Appendix C, show all analytes for all sediment and surface-water analytical methods.
6	Clarify the rationale for requesting dioxin analyses from limited samples and determine whether adequate analyses were conducted for surface water.	n/a	n/a	The NMED-approved work plan did not specify collection and analysis of any surface-water samples from Ancho, Chaquehui, or Indio Canyons, and no samples were collected as a part of this plan's implementation. Therefore, this investigation was consistent with the approved work plan. The surface-water data included in this report were obtained under other programs, and these data were included in this report for completeness. No revision is required.
7	Revise the ecological risk assessment to use a hazard quotient (HQ) of 1.0 as the threshold value for determining whether chemicals of potential ecological concern (COPECs) should be further evaluated.	Section 8.1-4	Sections 7.1.1, 7.2-2, and 8.1 and associated tables; Table D-1.2-1	The ecological risk assessment (section 8.1) has been revised to use a HQ of 1 for all receptors. Sections 7.1.1 and 7.2.2 and Table D-1.2-1 include a revised list of COPECs.

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8	Comparisons of COPEC concentrations in Ancho, Chaquehui, and Indio Canyons with data from other canyons where detailed biota investigations have been conducted should not be a primary initial step in the ecological screening process, although it can be used in a weight of evidence analysis. Refinement of the ecological risk assessment may include the use of area use factors, population area use factors, and/or use of lowest-observed adverse effect levels (LOAELs).	Section 8.1-7	Section 8.1.6 and associated tables	The Laboratory has revised the ecological risk assessment to include comparisons with other biota studies at the Laboratory as additional evidence in a weight of evidence analysis (section 8.1.6), which also considers area use factors, detection frequency, and the range of background concentrations. Lowest effect ecological screening levels (L-ESLs) have been calculated for COPECs identified using an HQ of 1 and pre-existing ecological screening levels (ESLs). COPECs with HQs greater than 1 based on L-ESLs are evaluated using the weight of evidence evaluation.
9	Revise Table 6.2.1 to display the correct source for the chromium soil screening level (SSL).	Table 6.2-1	Table 6.2-5	Former Table 6.2-1 (now Table 6.2-5) has been revised to show the correct reference for the chromium SSL (NMED 2009, 108070).
10	Modify Table 6.3-1 to include the water ESL for chromium.	Table 6.3-1	Tables 6.3-2 and 6.3-3	Former Tables 6.3-1 and 6.3-2 (now Tables 6.3-2 and 6.3-3) have been revised to add the chromium ESL for water.
11	Update Table 6.4-1 to include the correct stormwater comparison value for thallium. Determine if the detected concentrations of thallium in stormwater at Ancho, Chaquehui, and Indio Canyons exceed the surface-water standard of 0.47 µg/L.	Table 6.4.1	Sections 6.3.2 and 7.2.2; Table 6.4-2	Former Table 6.4-1 (now Table 6.4-2) has been revised to include the current thallium standard. Because thallium results in nonstorm-related surface water are above 0.47 µg/L, sections 6.3.2 and 7.2.2 have been revised to include a discussion of thallium.
12	Revise Table 6.5.1 to clearly illustrate the screening values that were used for surface-water screening at Ancho, Chaquehui, and Indio Canyons.	Table 6.5-1	Table 6.5-1, section 5.4	Table 6.5-1 has been revised by adding footnotes with information on the screening and comparison values, providing cross-references to other tables in the report. Section 5.4 includes some revisions for clarification.

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13	Revise Table 8.2-4 to display accurate footnotes.	Table 8.2-4	Table 8.2-4	Table 8.2-4 footnotes have been revised.
14	Revise the risk assessment to include detections of arsenic in surface water that were obtained from filtered samples.	Table 8.2-5	Sections 7.2.2 and 8.2.2.3; Table 8.2-5	Table 8.2-5 and section 8.2.2.3 of the risk assessment have been revised to include the maximum concentrations of arsenic and other inorganic chemicals in either filtered or nonfiltered samples. Section 7.2.2 has also been revised to include discussion of arsenic.
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.