Cross-Reference of NMED NOD Comments and Revisions to Phase II Investigation Work Plan for Threemile Canyon Aggregate Area

NMED NOD Comment No.	Summary of NOD Comment Requirement	Section(s) in Original Report	Section(s) in Revised Report	Nature of Revision
General Cor	mment			· ·
1	Describe in detail the methods that will be used to collect the samples for volatile organic compounds (VOCs).	Sections 5.3 and 5.4	n/a*	Standard operating procedures (SOPs) relevant to collecting samples for VOC analysis are being revised. After the SOPs have been revised, an addendum to the work plan that provides detailed descriptions of methods to be used for collection of samples for VOC analysis will be submitted to NMED for review and approval.
Specific Co	mments			
1.a	Analyze samples collected at and west of location 12-610694 for barium.	Section 4.1.1.3	n/a	No revision necessary. Barium concentrations at location 12-610694 are not different from background. No additional sampling and analysis are necessary.
1.b	Discuss the vertical extent of silver at location 12-610647.	Section 4.1.1.3	Section 4.1.1.2 and Table 1.1-1	Revised text and table to indicate the vertical extent of silver is not defined at location 12-610647. Revised text to indicate additional sampling and analysis for silver at location 12-610647 are not warranted.
2.a	Collect samples to define the lateral extent of cobalt to north and east of Area of Concern (AOC) 12-004(a).	Section 4.1.2.3	Section 4.1.2.2	Revised text to clarify that cobalt concentrations decreased to the north and east. No additional sampling and analysis for cobalt in these directions are necessary.
2.b	Collect samples to define the vertical extent of chromium at location 12-610539 or explain why additional sampling is not necessary.	Section 4.1.2.3	n/a	No revision necessary. The text explains the vertical extent of chromium at location 12-610539 will be defined by samples collected from adjacent location 12-610540.

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3	Explain why additional samples are not proposed at location 12-610628 to define the vertical extent of chromium.	Section 4.1.4.3	Section 4.1.4.2	Revised text to explain that chromium results at location 12-610628 decreased with depth and vertical extent is defined. No additional sampling and analysis for chromium are necessary.
4	Collect samples at additional depths at proposed step-out locations.	Section 4.1.5.3	Section 4.1.5.3, Table 4.1-5	Revised text and table to indicate samples from step-out locations will be collected from additional depth intervals.
5	Change reference to AOC C-12-006 to AOC C-14-006.	Section 4.2.1.2	Section 4.2.1.2	Revised text to correct typographical error.
6.a	Propose sampling to define vertical extent of chromium at location 15-610721.	Section 4.3.3.2	n/a	No revision necessary. Chromium concentrations at location 12-610721 are not different from background and no additional sampling and analysis for chromium are necessary.
6.b	Correct the reference to sample location 15-610750.	Section 4.3.3.2	Section 4.3.3.2	Revised text to correct typographical error.
6.c	Propose sampling to define the vertical extent of copper at locations 15-610748 and 15-610762.	Section 4.3.3.2	Sections 4.3.3.2 and 4.3.3.3 and Table 4.3-3	Revised text to indicate copper concentrations decreased with depth at location 15-610748. No additional sampling and analysis for copper are necessary. Revised text and table to specify analysis of samples from location 15-610762 for copper.
6.d	Propose sampling to define vertical extent of lead at location 15-610742. (Note: location should be 15-610762, where only one depth was sampled.)	Section 4.3.3.2	Sections 4.3.3.2 and 4.3.3.3 and Table 4.3-3	Revised text and table to indicate vertical extent of lead is not defined at location 15-610762 and to specify analysis of samples from location 15-610762 for lead.
6.e	Propose sampling to define vertical extent of uranium at location 15-610742. (Note: location should be 15-610762, where only one depth was sampled.)	Section 4.3.3.2	Sections 4.3.3.2 and 4.3.3.3	Revised text to indicate vertical extent of uranium is not defined at location 15-610762. Revised text to clarify isotopic uranium data will be used to define vertical extent of total uranium.

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6.f	Propose sampling to define vertical extent of cesium-137 at location 15-610742. (Note: location should be 15-610762, where only one depth was sampled.)	Section 4.3.3.2	Sections 4.3.3.2 and 4.3.3.3 and Table 4.3-3	Revised text to indicate vertical extent of cesium-137 is not defined at location 15-610762. Revised text and table to specify analysis of samples from location 15-610762 for cesium-137.
7	Propose analysis of samples from location 15-610746 for lead.	Section 4.3.3.3	Section 4.3.3.3 and Table 4.3-3	Revised text and table to specify analysis of samples from locations 15-610746 and 15-610709 for lead.
8	Indicate vertical extent of some inorganic chemicals in not defined at locations 36-610821, 36-610822, 36-610824, 36-610825, 36-610826, and 36-610827.	Section 4.4.3.2	Section 4.4.3.2	Revised text to clarify that locations 36-610821 through 36-610828 are associated with Solid Waste Management Unit (SWMU) C-36-003, and the extent of contamination at these locations is discussed in section 4.4.4.2.
8.a	Indicate that the vertical extent of cadmium is not defined at location 36-610827.	Section 4.4.3.2	n/a	No revision necessary. Section 4.4.4.2, which summarizes nature and extent for SWMU C-36-003, indicates the vertical extent of cadmium is not defined at location 36-610827.
8.b	Propose sampling to define the vertical extent of chromium at locations 36-610822 and 36-610825.	Section 4.4.3.2	n/a	No revision necessary. Section 4.4.4.3, which presents proposed sampling for SWMU C-36-003, indicates samples collected at locations 36-610822 and 36-610825 will be analyzed for chromium.
8.c	Propose sampling to define vertical extent of copper at locations 36-610824 and 36-610827.	Section 4.4.3.2	n/a	No revision necessary. Section 4.4.4.3, which presents proposed sampling for SWMU C-36-003, indicates samples collected at locations 36-610824 and 36-610827 will be analyzed for copper.
8.d	Propose sampling to define vertical extent of total cyanide at location 36-610824.	Section 4.4.3.2	n/a	No revision necessary. Section 4.4.4.3, which presents proposed sampling for SWMU C-36-003, indicates samples collected at location 36-610824 will be analyzed for total cyanide.

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8.e	Propose sampling to define vertical extent of mercury at location 36-610824.	Section 4.4.3.2	n/a	No revision necessary. Section 4.4.4.3, which presents proposed sampling for SWMU C-36-003, indicates samples collected at location 36-610824 will be analyzed for mercury.
8.f	Indicate that vertical extent of silver is not defined at locations 36-610825 and 36-610827.	Section 4.4.3.2	n/a	No revision necessary. Section 4.4.4.2, which summarizes the nature and extent for SWMU C-36-003, indicates the vertical extent of silver is not defined at locations 36-610825 and 36-610827.
8.g	Propose sampling to define vertical extent of uranium at location 36-610824.	Section 4.4.3.2	n/a	No revision necessary. Section 4.4.4.2, which summarizes the nature and extent for SWMU C-36-003, indicates the vertical extent of uranium is defined at location 36-610824 by isotopic uranium data.
8.h	Indicate that vertical extent of Aroclor-1254 and Aroclor-1260 is not defined at location 36-610824.	Section 4.4.3.2	n/a	No revision necessary. Section 4.4.4.2, which presents results for SWMU C-36-003, indicates the vertical extent of Aroclor-1254 and Aroclor-1260 is not defined at location 36-610824.
8.i	Propose sampling to define vertical extent of 4-isopropyltoluene at locations 36-610821, 36-610822, and 36-610826.	Section 4.4.3.2	n/a	No revision necessary. Section 4.4.4.2, which summarizes the nature and extent for SWMU C-36-003, indicates the vertical extent for 4-isopropyltoluene is defined, except at location 36-610826. Section 4.4.4.3, which presents the proposed sampling for SWMU C-36-003, indicates samples collected at location 36-610826 will be analyzed for 4-isopropyltoluene.
8.j	Propose sampling to define vertical extent of plutonium-238 at location 36-610822.	Section 4.4.3.2	n/a	No revision necessary. Section 4.4.4.3, which presents the proposed sampling for SWMU C-36-003, indicates samples collected at location 36-610822 will be analyzed for isotopic plutonium.

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8.k	Propose sampling to define vertical extent of tritium at locations 36-610825 and 36-610826.	Section 4.4.3.2	n/a	No revision necessary. Section 4.4.4.3, which presents the proposed sampling for SWMU C-36-003, indicates samples collected at locations 36-610825 and 36-610826 will be analyzed for tritium.
1.8	Propose sampling to define vertical extent of uranium-234 at location 36-610824.	Section 4.4.3.2	n/a	No revision necessary. Section 4.4.4.2, which summarizes the nature and extent for SWMU C-36-003, indicates uranium-234 activities did not increase with depth at location 36-610824. No additional sampling is necessary.
9	Propose collection of samples from additional depths at locations 8-7 and 8-8.	Section 4.4.3.3	Section 4.4.3.3 and Table 4.3-3	Revised text and table to specify collection of confirmation samples at locations 8-7 and 8-8 at the same depths as other confirmation samples.
10.a	Indicate the vertical extent of silver is not defined at locations 36-610824 and 36-610826.	Section 4.4.4.2	Sections 4.4.4.2 and 4.4.4.3 and Table 4.4-4	Revised text to indicate the vertical extent of silver is not defined at locations 36-610824 and 36-610826. Revised text and table to specify analysis of samples from these locations for silver.
10.b	Include cadmium in analytical suite for samples from location 36-610824.	Section 4.4.4.2	n/a	No revision necessary. Cadmium concentrations at location 12-610824 are not different from background, and no additional sampling and analysis for cadmium are necessary.
11	Address removal of silver and Aroclor-1254 from drainage at SWMU C-36-003. Analyze confirmation samples for silver and Aroclor-1254.	Section 4.4.4.3	Sections 4.4.3.3 and 4.4.4.3 and Table 4.4-4	Revised text to clarify that area excavated to remove polycyclic aromatic hydrocarbons (PAHs) will also address removal of silver and polychlorinated biphenyls (PCBs). Revised text and table to specify analysis of confirmation samples collected within excavated area for silver and PCBs.

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12	Collect confirmation samples from depths of 3–4 ft and 7–8 ft bgs.	Table 4.4-3	Section 4.4.3.3 and Table 4.4-3	Revised text and table to specify collection of samples at 5–6 ft and 9–10 ft bgs at confirmation sampling locations not already being sampled for vertical extent. (Most confirmation sample locations are already being sampled at greater depths for vertical extent.)

^{*}n/a = Not applicable.