Cross-Reference of NMED NOD Comments and Revisions to the Potrillo and Fence Canyons Aggregate Area Investigation Report

NMED NOD Comment No.	Summary of NOD Comment	Section(s) in Original Report	Section(s) in Revised Report	Nature of Revision
General Comments				
1	Evaluate the need for additional sampling of dioxins and furans in Potrillo and Fence Canyons.	n/a*	n/a	No revision necessary. A future work plan for additional investigations in Potrillo and Fence Canyons will address the extent of dioxins and furans in canyons media based on the aggregate area investigation results.
2	Provide a summary table showing contaminant concentrations by depth to better evaluate vertical extent of contamination.	Appendix G	Appendix G	Added Tables G-1 and G-2 to Appendix G to present all inorganic chemical and radionuclide data, respectively, for each sample.
n/a	n/a	Throughout	Throughout	Minor editorial changes were made throughout the document for the sake of correctness and clarity.
Specific Comments				
1	Collect background samples to verify conclusion that detections of dioxins and furans are attributable to background and consider dioxins and furans to be chemicals of potential concern (COPCs).	Section 5.0, p. 15	n/a	No revision necessary. Detected dioxin and furan congeners will be retained as COPCs.
2	Revise figures for Solid Waste Management Unit (SWMU) 15-007(a) to correctly depict excavation boundary.	Section 6.3.4.1, p. 26	Figure 6.3-1, Plates 2 and 3	Revised Figure 6.3-1 to include the landfill and excavation boundary for SWMU 15-007(a). Revised plates to include the actual landfill boundary.
3	Address the vertical extent of contamination when site investigations are conducted in the future.	Section 6.7.4.4, p. 47	Section 6.7.4.4, p. 47	Revised text to indicate future characterization of the nature and extent of contamination at the E-F Firing Site will include the assessment of vertical extent.

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4	Discuss analytical data from all locations in the evaluation of spatial distribution of contamination.	Section 6.7.4.4, pp. 47–51	n/a	No revision necessary. Locations 15-613384, 15-613385, 15-613386, 15-613387, 15-613388, and 15-613389 are sediment catchment sampling locations for assessing the potential off-site migration of contamination.
	Resolve the discrepancy regarding decreases of barium, cadmium, mercury, potassium, and sodium concentrations cannot depth.		Section 6.7.4.4, pp. 47–49	Added location 15-02182 to the list of locations sampled at one depth only and removed the results that indicated contaminant concentrations decreased with depth at this location. Revised text to indicate only one depth was sampled at location 15-02182.
	Revise text to indicate selenium concentrations increased with depth at locations 15-613384, 15-613386, 15-613387, 15-613388, and 15-613389 and remained the same at location 15-613385.		n/a	No revision necessary. Locations 15-613384, 15-613385, 15-613386, 15-613387, 15-613388, and 15-613389 are sediment catchment sampling locations for assessing the potential off-site migration of contamination.
	Correct the typographical error to provide the correct location where zinc concentrations decreased with depth.		Section 6.7.4.4, p. 51	Corrected the typographical error.
5	Include all analytical data from all locations in the discussion of spatial distribution of contamination.	Section 6.7.4.4, pp. 51–52	n/a	No revision necessary. Locations 15-613384, 15-613385, 15-613386, 15-613387, 15-613388, and 15-613389 are sediment catchment sampling locations for assessing the potential off-site migration of contamination.
	Resolve the discrepancy regarding decrease of cesium-137 activities with depth.		Section 6.7.4.4, p. 51	Revised text to indicate vertical extent of cesium-137 could not be assessed because only one sample was collected at location 15-02182.

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6	Resolve the discrepancy regarding two surface disposal areas located south and east of SWMU 15-008(a), not just south.	Section 6.8.1, p. 54	Section 6.8.1, p. 54	Revised text to correctly describe the location of both components of SWMU 15-008(a).
7	Correct typographical error to provide the correct location.	Section 6.8.2, p. 56	Section 6.8.2, p. 55	Corrected the typographical error.
8	Revise Plates 6, 7, and 8 to correctly label Firing Point F in the inset.	Section 6.8.4.3, p. 56	Plates 7, 8, and 9	Revised insets on Plates 7, 8, and 9 to correctly label location of Firing Point F.
9	Revise text to indicate perchlorate increased with depth at locations 15-613409, 15-613412, and 15-613414, and vertical extent is not defined.	Section 6.8.4.4, p. 59	Section 6.8.4.4, p. 59	Revised text to indicate perchlorate concentrations were below estimated quantitation limits (EQLs) and vertical extent is defined.
10	Revise text to indicate perchlorate increased with depth at location 15-613253, and vertical extent is not defined.	Section 6.9.4.4, p. 64	Section 6.9.4.4, p. 64	Revised text to indicate perchlorate concentrations were below EQLs and vertical extent is defined.
11	Correct typographical error in reference to area of concern (AOC).	Section 6.11.2, p. 66	Section 6.11.2, p. 66	Corrected location description of AOC C-36-006(e) in text.
12	Retain selenium as a COPC for risk assessments.	Section 6.11.4, p. 69	n/a	No revision necessary. Selenium will be retained as COPC when the risk assessment is performed.
13	Clarify the spatial distribution of uranium-234.	Section 6.11.4.4, p. 70	Section 6.11.4.4, p. 70	Revised text to indicate that uranium-234 activities decreased in the drainage downgradient.
14	Revise text to indicate selenium was detected above background value (BV) at downgradient location 15-613263, and benzoic acid and toluene were detected at location 15-613262.	Section 6.11.4.4, p. 71	Section 6.11.4.4, p. 71	Revised text to indicate concentrations of detected inorganic chemicals and organic chemicals decreased in the drainages or were below EQLs downgradient of AOC 15-008(f).

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15	Revise the text and delete discussion of nature and extent at SWMU 15-009(e); include it in the upcoming Phase II investigation report when sampling is complete at the site.	Section 6.12.4.4, pp. 74–76	Section 6.12.4.4, p. 74	Added summary to explain that the full nature and extent of contamination at SWMU 15-009(e) are not yet defined, that the nature and extent of contamination based on samples collected to date is presented to guide sampling in the Phase II investigation, and that additional samples will be proposed in the Phase II work plan.
16	Collect samples from locations beneath the former drainlines and from outfall area as proposed in the approved work plan. Analyze all samples for the analytical suite proposed in the work plan.	Section 6.13.4.4, pp. 79–81	Section 6.13.4.4, p. 79	Added a summary to explain that the full nature and extent of contamination at SWMU 15-010(a) are not yet defined, that the nature and extent of contamination based on samples collected to date is presented to guide sampling in the Phase II investigation, and that additional samples will be proposed in the Phase II work plan.
17	Clarify which sampling locations at SWMU 15-009(e) were considered appropriate to define the lateral extent for AOC C-15-004; reevaluate whether lateral extent of contamination is defined for AOC C-15-004 or additional sampling is necessary.	Section 6.14.4.4, pp. 83–84	Section 6.14.4.4, p. 84	Revised text to identify applicable downgradient sampling location as 15-61338, which is associated with SWMU 15-004(f).
18	Revise text to indicate barium concentrations decreased at AOC C-15-005.	Section 6.15.4.4, p. 87	Section 6.15.4.4, p. 87	Revised text to indicate a decrease in the concentration of barium downgradient and to indicate lateral extent of barium is defined.
19	Revise text to indicate 15-613300, not 15-613303, is downgradient from locations 15-613298 and 15-613303.	Section 6.15.4.4, p. 89	Section 6.15.4.4, p. 89	Revised text to indicate the correct sampling location.
20	Collect samples from two depths (0–1 ft and 4–5 ft) beneath the bottom of the excavation and include dioxin and furan analysis in the analytical suite to define vertical extent of contamination.	Section 7.2.4.4, p. 98	n/a	No revision necessary. Samples will be collected from the appropriate depth intervals in the Phase II investigation and will be analyzed for dioxins and furans.

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21	Revise report to remove discussion of nature and extent of contamination because samples were not collected at or below the outfall at SWMU 36-003(b).	Section 7.3.4.4, pp. 101–102	Section 7.3.4.4, pp. 101–102	Added a summary to explain that the full nature and extent of contamination at SWMU 36-003(b) are not yet defined, that the nature and extent of contamination based on samples collected to-date is presented to guide sampling in the Phase II investigation, and that additional samples will be proposed in the Phase II work plan.
22	Resolve the discrepancy regarding hexa-congeners detected at AOC 36-004(a).	Section 7.4.4.4, p. 105	n/a	No revision necessary. Results for total dioxins/furans reported in Table 7.4-3 are artifacts of the analytical method and are not representative of individual dioxin and furan congener detections or concentrations.
23	Resolve the discrepancy regarding tetra-, penta-, and hexa-congeners detected at SWMU 36-006.	Section 7.5.4.4, p. 110	n/a	No revision necessary. Results for total dioxins/furans reported in Table 7.5-3 are artifacts of the analytical method and are not representative of individual dioxin and furan congener detections or concentrations.
24	Revise text to indicate selenium was detected at location 15-613267, not location 15-613263.	Section 7.6.4.4, p. 113	Section 7.6.4.4, p. 113	Revised text to correct location.
25	Resolve the discrepancy regarding hexachlorodibenzodioxins detected at AOC 36-004(c).	Section 7.7.4.4, p. 118	n/a	No revision necessary. Results for total dioxins/furans reported in Table 7.7-3 are artifacts of the analytical method and are not representative of individual dioxin and furan congener detections or concentrations.
26	Revise Table 7.8-4 to include samples collected from locations 15-613503 and 15-613504.	Section 7.8.4.4, p. 124	Section 7.8.4.4, p. 124 and Table 7.8-4	Removed cesium-137 results from Figure 7.8-4. Cesium-137 in samples collected at locations 15-613503 and 15-613504 was not detected or was detected below the sediment BV (0.9 pCi/g).

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27	Obtain appropriate cultural resource clearance and collect samples from SWMU 36-005 locations proposed in the approved investigation work plan to complete characterization of the site.	Section 7.10.4, p. 127	Section 7.10.4, p. 127	No revision necessary. Cultural resource clearance and sampling at some of the locations proposed in the investigation work plan are not possible because of the presence of archaeological resources.
28	Revise text to clarify 10, not 9, samples were analyzed for isotopic uranium and gamma-emitting radionuclides at AOC C-36-006(e).	Section 7.12.4.3, p. 133	Section 7.12.4.3, p. 134	Corrected sample count in the text.
29	Describe in sufficient detail the methods to collect samples for volatile organic compounds (VOCs).	Appendix B, B-5.1, p. B-3	Appendix B, section B-5.1, and Table B-1.0-1	Added text to Appendix B and revised table to clarify the methods used for VOC sample collection.
30	Revise text to indicate four samples were collected rather than six, as stated in the text.	Appendix B, section B-11, p. B-9	Appendix B, section B-11.0, p. B-9	Revised text to state four rather than six samples were collected at SWMU 15-009(e).
31	Revise table B-11.0-1 to include cyanide and perchlorate analyses for location 15-613313 rather than VOCs and pesticides.	Appendix B, Table B-11.0-1, p. B-34	Appendix B, Table B-11.0-1, p. B-34	Revised Table B-11.0-1 to include cyanide and perchlorate analyses for location 15-613313.
32	NMED approved area of contamination designation for only three of five sites [i.e., SWMUs 15-007(a), 36-001, and 36-006]. An AOC designation was not approved for SWMU 15-008(a). Resolve the discrepancy and clarify whether wastes were staged at SWMU 15-008(a) after NMED disapproved the area of contamination designation.	Appendix C, section C-1, p. C-1	Appendix C, section C-1, p. C-1	Revised text to identify the three approved areas of contamination and to explain wastes from SWMU 15-008(a) were characterized as nonhazardous, containerized and accumulated in a designated waste accumulation area, and disposed of at Technical Area 54.

*n/a = Not applicable.