

Permit

8/26/2002

Index of the Comments Received through July 31, 2002 by NMED on Los Alamos National Laboratory (LANL) Draft Corrective Action Order ^a				
Unique No.	AR/ Invoice No. or Location ^b	Date of Letter or e-mail	Commenter - Association	Subject: Issue or Comment
1		05/02/2002	Glen Wurden, Citizen	Violation Penalties
2		05/03/2002	H. L. Daneman, Citizen (Letter to University of California)	Cleanup Program, CAB, Public Participation, Environmental Restoration Rating
		06/11/2002		Schedule of Cleanup, Diversion of Cleanup Funds, CAB, Plutonium Pits, University of California, Accord Pueblos, Water Quality Task Force, Support
3		05/07/2002	Elizabeth Allen, Citizen	Support, Compensation for Health Problems
4		05/08/2002	Lindsay A. Lovejoy, Jr., Assistant Attorney General, Attorney General of New Mexico	Use of Modeling
		07/12/2002		Public Participation
		07/30/2002		Public Participation, Accessibility of Information, TA-1; TA-3; TA-10, SWMUs 10-003(a) and 10-007; TA-15; TA-16, SWMU 16-003(o); TA-16, SWMU 16-008(a); TA-16, SWMU 16-108 (MDA P) and TA-16-387; TA-16, SWMUs 16-021(c) and 16-003(k); TA-18, SWMU 18-001(a,b,c); TA-21, SWMU 21-011(k); TA-21, SWMU 21-014 (MDA A); TA-21, SWMU 21-015 (MDA B); TA-21, SWMS 21-106(a-c)(MDA T); TA-21, SWMUs 21-017(a-c) and 21-022(f) (MDA U); TA-21, SWMUs 21-013(b,g) and 21-108(a,b), MDA V); TA-21, SWMU 21-024(i); TA-32; TA-33; TA-35; TA-36; TA-39; TA-48; TA-49, SWMUs 49-001(a-g) and 49-003 and AOC C-49-008(d) (MDA AB, Areas 1, 3, 4, 11, 12); TA-49, SWMUs 49-005(a) and 49-006 and AOCs C-49-002, C-49-005(b), and C-49-008(a,b) (Areas 5, 6, 10); TA-50, SWMU 50-009 (MDA C); TA-53, SWMU 53-002(a,b); TA-54, SWMU 54-004 (MDA H); TA-54, SWMU 54-006 (MDA L); TA-54, SWMUs 54-013(b), 54-014(b-d), 54-015(k), 54-017, 54-018, 54-019, and 54-020 (MDA G); TA-73, SWMUs 73-001(a-d) and 73-004(d) (Airport Landfill) (Drainages and Mesa Top); TA-73, SWMU 73-002; Schedule of Deliverables by TA, Canyon, or



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				Watershed
5		05/08/2002	John Bredehoeft, The Hydrodynamics Group	Use of Modeling, Area G Performance Assessment
6		05/13/2002	Lydia Clark, Los Alamos Study Group	Public Participation, Orders for Corrective Action, Cleanup Standards, Cleanup Orders, Unpermitted Disposal Facilities, Letter of Intent
7		05/27/2002	Florence C. and Irwin R. Cromwell, Citizens	Support
8		06/02/2002	James D. Dryer, Citizen	Cleanup Methodology
9		06/06/2002	James R. Brannon, Northern New Mexico Citizens' Advisory Board	Support, Schedule of Cleanup, Working Relationships, ISE Determination, Previous Work at LANL, Accessibility of Information, Prioritization of Order, Duplication of Effort, DOE Resources, NMED Resources, Emphasis on Cleanup
10		06/07/2002	Donivan R. Porterfield, Citizen	Accessibility of Information, Schedule for Document Review, MARLAP, Spelling, Correct Terminology, Gamma Spectroscopy, Variance Criteria, Chemical Analyses, Detection Limits, Laboratory QA/QC Requirements, QA, Control Limits
11		06/20/2002	Dorothy Hoard, Citizen	Diversion of Cleanup Funds, ISE Determination, Previous Work at LANL, Transfer of Land, Compliance Schedule Tables, Reporting Requirements, NMED Resources
12		06/22/2002	Bonnie Bonneau, Citizen	Support, ISE Determination, Radioactive Contamination, Independent Oversight
13		06/26/2002	Ditto Nowakoski, Citizen	Radioactive Contamination
14		07/09/2002	Gareth Gallegos, Citizen	Groundwater Cleanup, Post-Fire Concern, Schedule of Cleanup, Cleanup Methodology
15		07/29/2002	Richard M. Weinstein, Citizen	ISE Determination, Support, Past Non-Compliance, Violation Penalties, Compliance Schedule Tables
16		07/30/2002	Fred Brueggerman, Deputy County Administrator, Los Alamos County	Support, SWMUs on Non-Federal Land, Schedule of Cleanup, Site Investigations, Newly Identified SWMUs or AOCs, Purposes, Voluntary Corrective Action Procedure, Document Review Schedule, Reporting Requirements, Cleanup and Screening Levels, Drilling Methods, Voluntary Corrective Measures Plan/Report

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Unique No.	AR/ Invoice No. or Location^b	Date of Letter or e-mail	Commenter - Association	Subject: Issue or Comment
17		07/30/2002	John Parker, Chief, DOE Oversight Bureau, State of New Mexico Environment Department	Reporting, Mortandad Canyon Watershed, Water Canyon/Canon de Valle Watershed, Pajarito Canyon Investigation, Sandia Canyon Investigation, Erosion Control and Monitoring, Section Reference
18		07/31/2002	<p>Greg Mello, Los Alamos Study Group</p> <p>Los Alamos Study Group Press Advisory, May 8, 2002</p> <p>May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid</p> <p>Los Alamos Study Group, July 8, 2002, "Very Informal Comments on the May 31,2002 Letter of Intent signed by NMED, EPA, and DOE</p> <p>Los Alamos Study Group, July 10, 2002, "New Mexico Environmental Department Sells Out"</p> <p>Los Alamos Study Group, July 18, 2002,"Brief Notes to the Administrative and Legal Processes Underway which Affect the Continuing Disposal of Nuclear Waste at Los Alamos and the Prospects for Cleaning up Contaminated Sites There"</p>	<p>Administrative Record, Public Participation, Future Research, Closure Plans</p> <p>Cleanup Standards, Diversion of Cleanup Funds, Area G, Public Participation, NMED/DOE Collaboration</p> <p>Letter of Intent, Area G</p> <p>Letter of Intent, Accelerating Risk Reduction, Cleanup Program, National Security Mission, Long-Term Environmental Stewardship, Quick-to-WIPP, Watershed Aggregate Approach, Defining Regulatory Endpoint, Institutional Controls, Environmental Covenants Act, Use of Modeling, Public Participation, Protection of Workers, Innovative Cleanup Procedures, Performance Management Plan,</p> <p>Not provided</p> <p>ISE Determination, Previous Work at LANL, CAO, Public Participation, Letter of Intent, UC Lawsuit, Closure Plans, High Performance Teams, RCRA Operating Permit, Environmental Covenant Act, Area G Performance Assessment, Annual Unit Audit, Enforcement Actions, Permit Modifications</p>
19		07/31/2002	Dorelen F. Bunting, Albuquerque Center for Peace and Justice. May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia	Letter of Intent, Area G

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			Madrid (submitted with LASG comments).	
20		07/31/2002	Brian Shields, Amigos Bravos. May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Letter of Intent, Area G
21		07/31/2002	Dolores Herrera, Albuquerque San Jose Community Awareness Council. May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Letter of Intent, Area G
22		07/31/2002	Stephen Picha, The Center for Action and Contemplation. May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Letter of Intent, Area G
23		07/31/2002	Deborah Reade, Citizens for Alternatives to Radioactive Dumping. May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Letter of Intent, Area G
24		07/31/2002	John Horning, Forest Guardians. May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Letter of Intent, Area G
25		07/31/2002	Allison Moore, Green Party of Santa Fe. May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Letter of Intent, Area G
26		07/31/2002	Dan Piburn, Green Party of Santa Fe. May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Letter of Intent, Area G
27		07/31/2002	Peter Neils, Native Forests Network. May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Letter of Intent, Area G

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Unique No.	AR/ Invoice No. or Location^b	Date of Letter or e-mail	Commenter - Association	Subject: Issue or Comment
28		07/31/2002	Mark Sardella, Southwest Energy Institute. May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Letter of Intent, Area G
29		07/31/2002	Sam Hitt, Wild Watershed. May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Letter of Intent, Area G
30		07/31/2002	Harry Browne, Gila Resources Information Project. May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Letter of Intent, Area G
31		07/31/2002	David Bacon, Green Party. May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Letter of Intent, Area G
32		07/31/2002	Michael Guerrero, Southwest Organizing Project. May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Letter of Intent, Area G
33		07/31/2002	Jaime Chavez, Water Information Network. May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Letter of Intent, Area G
34		07/31/2002	Penelope McMullen, Sisters of Loretto May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Support, Compliance/Litigation, Public Participation, Accessibility of Information Letter of Intent, Area G
35		07/31/2002	Geoffrey H. Fettus, Staff Attorney, and Christopher Paine, Senior Policy Analyst, Natural Resources Defense Council	Support; ISE Determination; Facility Investigation; Investigations for Other SWMSs and AOCs; On-Going Investigations; Compliance Schedule Tables; Immediate Remedial Action; Urgent Corrective Actions; Technical

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Unique No.	AR/ Invoice No. or Location ^b	Date of Letter or e-mail	Commenter - Association	Subject: Issue or Comment
				Area 50: MDA C; Area G; Technical Area 49: MDA AB, Areas 1, 3, 4, 11, and 12; SWMU-16-003(o); SWMU 16-008(a); SWMU 16-018 (MDA P) and TA-16-387; SWMU 16-021(c) and 16-003(k); Technical Area 54; Cleanup and Screening Levels; Cleanup Standards; Implementability; Risk-Based Variance from Cleanup Standards or Levels; Long-Term Stewardship; Long-Term Reliability and Effectiveness; Performance Management Plan; Special Technical Advisory Board, DOE Resources; NMED Resources; Reprisal Provision; Intent of Study Effort
36		07/31/2002	Jay Coghlan, Director, Nuclear Watch of New Mexico	ISE Determination, Diversion of Cleanup Funds, UC Lawsuit, Support, Orders for Corrective Action, Findings of Fact, Conclusions of Law, Purposes, Jurisdiction, Work Plans and Schedules, Availability of Information, Enforcement, Relationship to Work Completed, Integration with Permit, Facility Investigations, Groundwater Monitoring Plan, Background Investigation, Monitoring Wells and Piezometers, Springs, Sediment Investigation, Historical Investigation of Canyon Watersheds, Technical Area Investigations, Area G, TA-21 Historical Investigation, Technical Area 50 MDA C, Technical Area 49, Technical Area 10, Investigation for Other SWMUs and AOCs, Newly Discovered Releases from SWMUs or AOCs, Interim Measures, On-Going Investigations, Risk Analysis General, Conceptual Site Model, Risk Screening Levels, Cleanup Standards, Remedy Evaluation Criteria, Approval of Corrective Measures Evaluation Report, Relationship to Corrective Action Requirements, Corrective Measures Implementation Plan, Community Relations Plan, Cleanup and Screening Levels, Implementability, Risk-Based Variance from Cleanup Standards or Levels, Investigations and Sampling

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Unique No.	AR/ Invoice No. or Location ^b	Date of Letter or e-mail	Commenter - Association	Subject: Issue or Comment
			May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Methods and Procedures, Monitoring Well Construction Requirements, Reporting Requirements, Compliance Schedules Tables, Reprisal Provision, Comparison to Other States' Orders, Projected Cost of Compliance, Waste Inventories, QA, NMED Resources, Letter of Intent Letter of Intent, Area G
37		08/01/2002	Joni Arends, Waste Programs Director, Concerned Citizens for Nuclear Safety May 28, 2002 Letter from 17 New Mexico environmental organizations to Attorney General Patricia Madrid (submitted with LASG comments).	Public Participation, Facility, Canyon Watershed Investigations Background, Compliance/Litigation, Definitions, Document Retention, Enforcement, General Facility Information, Background Investigation, Springs, Corrective Measures Evaluation Report, Pre-LANL Cleanup Levels, Risk Analysis General, Section Reference, Threshold Criteria, Remedy Completion Report, Document Retention Letter of Intent, Area G
38		07/31/2002	John C. Browne, Director, Los Alamos National Laboratory (LANL) (submittal included Attachments 1 0 7, noted below) Attachment 1 – Letter from Beverly Ramsey, Division Director RRES (July 30, 2002) Attachment 2 – ISE Determination Attachment 3 – Letter from Fred Brueggeman, Deputy	ISE Determination, Regulatory Authority, FWPCA, HE Compounds/Military Munitions, PCBs, Fairness Principals, Human Health Risk Assessment, AEA, Mixed Waste, Remedy Selection Risk Reduction, Environmental Stewardship General Inconsistencies Notification of Risk

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			<p>County Administrator for County of Los Alamos</p> <p>Attachment 4 –Supplemental Comments</p> <p>Attachment 5 – Supplemental Comments</p>	<p>Facility Operations, Definitions, Groundwater Investigation, Springs, Sediment Investigation, Surface Water Investigation, Canyon Watershed Investigations, Technical Area 10 Drilling Explorations, Groundwater Radionuclide Reporting Levels, Soil Cleanup Levels, Soil Radionuclide Reporting Levels</p> <p>Background, General Facility Information, Groundwater Investigation, Objectives, Groundwater Monitoring Plan, Background Investigation, Regional Wells, Springs, Surface Water Investigation, Pueblo Canyon Alluvial Groundwater Well Installation, Pueblo Canyon Groundwater Monitoring, Los Alamos Canyon Alluvial Groundwater Well Installation, Los Alamos Canyon Intermediate Groundwater Well Installation, Los Alamos Canyon Regional Groundwater Well Installation, Los Alamos Canyon Groundwater Monitoring, Mortandad Canyon Alluvial Groundwater Well Installation, Mortandad Canyon Intermediate Groundwater Well Installation, Mortandad Canyon Regional Groundwater Well Installation, Mortandad Canyon Groundwater Monitoring, Water Canyon/Canon de Valle Alluvial Groundwater Well Installation, Water Canyon/Canon de Valle Regional Groundwater Well Installation, Water Canyon/Canon de Valle Groundwater Monitoring, Pajarito Canyon Alluvial Groundwater Well Installation, Pajarito Canyon Regional Groundwater Well Installation, Pajarito Canyon Groundwater Monitoring, Sandia Canyon Groundwater Well Installation, Sandia Canyon Groundwater Monitoring, Groundwater Well Installation for the Other Canyons, Groundwater Monitoring for the Other Canyons, MDA G Survey of Disposal Units, MDA</p>

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				G Drilling Explorations, MDA G Soil and Rock Sampling, MDA G Intermediate Groundwater Well Installation, MDA G Regional Groundwater Well Installation, MDA G Groundwater Monitoring, MDA L Survey of Disposal Units, MDA L Intermediate Groundwater Well Installation, MDA L Regional Groundwater Well Installation, MDA L Groundwater Monitoring, MDA A Intermediate Groundwater Well Installation, MDA A Groundwater Monitoring, MDA B Intermediate Groundwater Well Installation, MDA B Groundwater Monitoring, MDA T Groundwater Monitoring, MDA U Intermediate Groundwater Well Installation, MDA U Groundwater Monitoring, MDA V Investigation, MDA V Drilling Explorations, MDA V Soil and Rock Sampling, MDA V Intermediate Groundwater Well Installation, MDA V Groundwater Monitoring, MDA C Survey of Disposal Units, MDA C Soil and Rock Sampling, MDA C Regional Groundwater Well Installation, MDA C Groundwater Monitoring, Technical Area 49 Drilling Explorations, Technical Area 49 Intermediate Groundwater Well Installation, Technical Area 49 Groundwater Monitoring, Technical Area 10 Drilling Explorations, Technical Area 10 Soil and Rock Sampling, Technical Area 10 Groundwater Monitoring, SWMU 16-018 (MDA P) and TA-16-387 Continued Investigation, Remedy Completion Report, LANL Standard Operating Procedures, Field Exploration Activities, Subsurface Features/Utility Geophysical Surveys, Soil, Rock, and Sediment Sample Field Screening, Soil, Rock, and Sediment Sample Types, Sample Point and Structure Location Surveying, Subsurface Vapor-phase Monitoring and Sampling, Groundwater Levels, Groundwater and Surface Water Sampling, Groundwater and Surface Water Sample

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			Attachment 6 – Supplemental Comments	Types, Sample Handling, Chemical Analyses, Laboratory QA/QC Requirements, Quality Assurance Procedures, Equipment Calibration Procedures and Frequency, Laboratory QA/QC Samples, Laboratory Deliverables, Review of Field and Laboratory QA/QC Data, Field Duplicates, Method Reporting Limits, Comparability, Laboratory Reporting, Documentation, Data Reduction, and Corrective Action, Well Screen and Filter Pack Design, Reporting Requirements, General, Investigation Work Plan, Executive Summary (Abstract), Investigation Methods, Monitoring and Sampling Program, Investigation Report, Exploratory Drilling or Excavation Investigations, Exploratory and Monitoring Well Boring Geophysical Logging, Materials Testing Results, Conclusions, Recommendations, Appendices, Chemical Analytical Reports, Periodic Monitoring Report, Tables, Figures, Risk Assessment Report, Conceptual Site Model, Risk Screening Levels, Risk Assessment Results, Corrective Measures Evaluation, Compliance Schedule Table 1 Facility Operations, Entry and Inspection, General Facility Information, Groundwater Investigation, Objectives, Groundwater Monitoring Plan, Geophysical Investigations, Background Investigation, Sediment Investigation, Surface Water Investigation, Canyon Watershed Investigations, Historical Investigation, Pueblo Canyon Source Area Investigations, Pueblo Canyon Sediment Sampling, Pueblo Canyon Surface Water Monitoring, Pueblo Canyon Alluvial Groundwater Well Installation, Pueblo Canyon Regional Groundwater Well Installation, Pueblo Canyon Groundwater Monitoring, Mortandad Canyon Alluvial Groundwater Well Installation, Mortandad Canyon Regional

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				Groundwater Well Installation, Technical Area Investigations, Technical Area 54, MDA G Investigation Work Plan, MDA G Drilling Explorations, MDA G Canyon Alluvial Sediment Sampling, MDA G Regional Groundwater Well Installation, MDA H Investigation, MDA H Drilling Explorations, MDA H Soil and Rock Sampling, MDA H Sediment Sampling, MDA H Vapor Monitoring, MDA H Groundwater Well Installation, MDA H Investigation Report, MDA L Drilling Explorations, MDA L Canyon Alluvium and Sediment Sampling, MDA B Investigation Work Plan, MDA B Survey of Disposal Units, MDA B Drilling Explorations, MDA B Soil and Rock Sampling, MDA B Vapor Monitoring, MDA T Drilling Explorations, MDA U Investigation Work Plan, MDA U Survey of Disposal Units, MDA U Drilling Explorations, MDA U Soil and Rock Sampling, MDA U Vapor Monitoring, MDA V Investigation Work Plan, MDA B Survey of Disposal Units, MDA V Drilling Explorations, Historical Background, MDA C Survey of Disposal Units, MDA C Drilling Explorations, MDA C Vapor Monitoring, Technical Area 49 Drilling Explorations, Technical Area 10 Investigation, Aggregate Areas, Newly Identified SWMUs and AOCs, Site Investigations, SWMU 3-010(a), SWMU 3-010(a) Continued Investigation, SWMU 16-003(o), SWMU 16-008(a) Continued Investigation, SWMU 16-108 (MDA P) and TA-16-387, SWMU 16-018 (MDA P) and TA-16-387 Continued Investigation, SWMU 16-021(c) and 16-003(k) Continued Investigation, SWMU 21-024(i) Continued Investigation, TA-35 Continued Investigation, SWMUs 53-002(a and b), SWMUs 73-001(a-d) and 73-0004(d), SWMU 73-002 Continued Investigation, Erosion Control and Monitoring, Risk Screening Levels, Remedy

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Unique No.	AR/ Invoice No. or Location^b	Date of Letter or e-mail	Commenter - Association	Subject: Issue or Comment
			Attachment 7 – Supplemental Comments	<p>Evaluation Criteria, Soil Cleanup Levels, Soil Radionuclide Reporting Levels, Investigation, Sampling, and Analyses Methods, General, Regulatory Criteria, Conclusions, Background, Table XII-2 Schedule of Deliverables by TA, Canyon, or Watershed, Table XII-3 Schedule of Deliverables by Calendar Year</p> <p>Facility, Facility Operations, Waste Management, Releases of Contaminants, Regulation of the Facility, Conclusions of Law, Definitions, Relationship to Work Completed, Background, General Facility Information, Surface Water Investigation, Pueblo Canyon Groundwater Monitoring, Mortandad Canyon Intermediate Groundwater Well Installation, Mortandad Canyon Groundwater Monitoring, Background, MDA V Investigation, Corrective Measures Evaluation Report, Groundwater Perchlorate Screening Levels, Soil Perchlorate Cleanup Levels, Surface Water Perchlorate Cleanup Levels, Tables</p>
<p>Notes:</p> <p>^a See the companion table “NMED Response to Comments Received through July 31, 2002 on the Los Alamos National Laboratory (LANL) Draft Corrective Action Order.</p> <p>^b Comments received after July 29, 2002 are not assigned an AR/Invoice number.</p> <p>^c (sp.) – Illegible signature/handwriting, best attempt at name.</p>				