

**NMED Response to Public Comment: August 2005 Request for No Further Action  
(Corrective Action Complete) Status for 28 Solid Waste Management Units / Areas of  
Concern at Sandia National Laboratories  
February 2008**

<b>Topic Area</b>	<b>Comment Summary</b>	<b>NMED Response Number</b>	<b>NMED Response and Final Decision</b>
SWMU 137	SNL requested that the New Mexico Environment Department (NMED) grant Corrective Action Complete without Controls status for SWMU 137. SNL stated that the site was adequately sampled, allowing for the use of average soil concentrations for silver and cyanide to calculate the Hazard Index (HI). This would lower the HI to an acceptable level of risk.	R1	Sixteen of twenty-eight soil samples collected at the southern drainfield contained silver and cyanide concentrations above background levels. Two of the samples analyzed for silver were above the NMED soil screening level of 380 mg/kg. Given the uncertainties in the soil sampling data, the somewhat small number of samples collected, and the shallow depth of the contamination, NMED does not approve using the mean concentrations for silver and cyanide to calculate the HI. Therefore, the level of risk from contamination is acceptable to the NMED only under an industrial land-use scenario, and controls limiting land use to industrial should apply to the site.
SWMUs 148, 152, and 276	SNL requested that NMED grant Corrective Action Complete without Controls status for SWMUs 148, 152, and 276. SNL stated that the concentrations of arsenic detected at these SWMUs were within background limits, and as that there was no process knowledge or site history to suggest that arsenic should be a contaminant of concern at any of the sites. Thus, using average concentrations of arsenic should be appropriate in the risk calculations for each site.	R2	Upon further review, NMED agrees that the concentrations of arsenic detected in soil samples from these sites were within background limits. Given that the concentrations were representative of background conditions, arsenic should not have been included in the risk calculations. Thus, the level of risk for each site is acceptable under a residential land-use scenario.