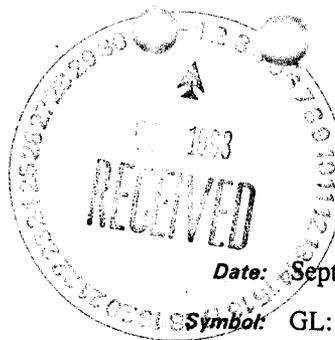


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Nicholas F. Persampieri, Esq.
Assistant General Counsel
NMED Office of General Counsel
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, NM 87502

HAND DELIVERED

RE: 98-01 - RFI REPORT (VOLUME II)

Dear Mr. Persampieri:

In the course of preparing the RFI report (Volume II) in connection with PRS 21-029, ER Project personnel have identified a number of areas that additional investigation of and/or additional sampling of would render more complete our characterization of the site. Consequently, a number of additional activities, beyond those identified in my letter to you dated August 14, 1998, will be included in the RFI report Volume II that will be submitted to your office during the first week of October. For your information, we are enclosing a copy of a "Summary of DP Tank Farm Workplan Objectives and Rationale for Expansion of Activities," in order to inform you of the general areas of expanded activity.

It is my understanding that at a recent regularly scheduled meeting of the ER Project staff and Hazardous and Radioactive Materials Bureau (HRMB) staff, Dave McInroy of ER informed John Kieling of HRMB of the expanded scope of the RFI Report. If Mr. Kieling would like to discuss the expanded scope of the RFI Report with ER Project staff, please let me know and we will be happy to arrange a briefing.

Please do not hesitate to give me a call regarding this matter, should you wish to discuss it further.

Sincerely,

Joseph B. Rochelle

Cys: Hortense Haynes, DOE/LAAO, (w/encl), A316
LC/GL File



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SUMMARY OF DP TANK FARM WORKPLAN OBJECTIVES AND RATIONALE FOR EXPANSION OF ACTIVITIES

The purpose of this document is to summarize the rationale for expanding the Work Plan [(Volume II) for DP Tank Farm] objectives beyond those agreed upon with NMED (HRMB and UST) in July 1998. The following list summarizes the work scope that was agreed upon with NMED, as summarized in the letter from Joseph Rochelle of UC to Nicholas Persampieri of NMED dated August 14, 1998. In the Discussion section that follows the list, we address the rationale for the expansion of the Work Plan activities and objectives.

1. **PROVIDE ALL EXISTING DATA**
2. **FRACTURES IN THE AREA**
3. **PLAN FOR INVESTIGATING THE SHEEN**

Including:

- walkover of the site to identify current visual extent of the sheen
- water samples upstream, at the sheen, and downstream
- sediment samples upstream, at the sheen, and downstream
- water and sediment samples over time (to determine if concentrations are increasing or decreasing over time)
- near surface vadose zone samples (hand augering) to determine current extent and direction of the sheen
- fingerprinting
- historical/archival investigation of other potential source terms.

4. **CONTINGENCIES**

Other technical issues that arose during the meeting with NMED included:

- A. sampling would not be required on the mesa top at this time (suggestion that the mesa top area of DP Tank Farm was adequately characterized pending investigation of the sheen)
- B. boreholes are inadequate for characterizing contamination in fractures
- C. recognized difficulty of "chasing" contamination in fractures on the mesa
- D. indications that the sheen area was about 20-30 feet in length in the stream bed
- E. indications that there are other potential source terms in the area
- F. human health and ecological receptor scenarios should be discussed.

DISCUSSION

Item 1 above was performed in preparation of the Work Plan, the results of which are described in the Work Plan. The main intent was to provide NMED with copies of all available data and related information, including, data from the 1994 (RFI) investigation, the 1995 (UST) investigation, and the 1996 VCA, chromatograms of data included in that data list, and data

related to PID measurements taken around the tanks in 1988. Research related to the last two data items (chromatograms and PID data) uncovered data gaps beyond those indicated in the July meeting with NMED. The PID data could not be located, and the chromatograms indicated the presence of hydrocarbons in samples taken from the boreholes around tanks 6 and 10 (hydrocarbons in the "motor oil" class). In searching for the PID data, a more thorough understanding of historical operations at the site uncovered other potential data gaps: culverts into DP Canyon, an earthen berm around the south and east of the site, valve boxes, and fill ports. The 1991 Work Plan focussed on the area of the tanks and the East and West Fill Stations. This was a Phase I effort in which it was not particularly expected that contamination would be found (because of the 1988 cleanup effort). Phase I sampling activities are usually biased to the locations at which "worst-case" contamination, if any, is expected. Once contamination is found in Phase I, the next step in the technical approach is usually to perform a much more extensive characterization of the site. Further characterization was performed only for the East and West Fill Stations because the tank area itself did not exhibit contamination (based on the data reports for the VOC and SVOC analyses). Now that the chromatograms have been reviewed and the potential presence of "motor oils" around tanks 6 and 10 has been identified, it is probably appropriate to perform a more extensive Phase II analysis. This more extensive Phase II investigation should involve sampling and analysis of additional specific source areas of contamination at DP Tank Farm (on the mesa top). The focus of the investigation should be additional sampling and analysis at the location of the tanks, and at other potentially contaminated areas including the culverts, the berm, the valve boxes, and the fill ports.

It should be noted that investigation of the sheen area will continue as planned and as discussed with NMED, the purposes of which are to determine extent and to identify a source term(s) of the sheen, if possible. Recent field investigations have revealed that the hydrologic conditions at the sheen, which vary significantly, have a substantial effect on the visual and olfactory presence of the sheen. Investigating the mesa top area for other potential sources of contamination for the sheen, or to rule out other possible sources, will assist gaining a better understanding of the conceptual model for this site as a whole and the contaminated areas therein.

In addition to reviewing the available chromatograms, the data were revalidated using 1998 validation protocols, and background comparisons were re-performed with the updated background information. The new background comparisons were complicated by incomplete information on the sample media (soil or tuff). If soil background comparisons are performed, then all inorganics appear to be at background levels; if tuff background comparisons are performed, then lead and possibly one or two other inorganics appear to exist at low-levels that are slightly greater than background (barium, and copper). [Note: either way, inorganics concentrations from the mesa top samples are considerably less than SALs.] Considering the sampling activities that are planned for specific areas of the mesa top in the proposed Work Plan, the opportunity exists to submit some samples for inorganics analysis to verify that inorganics are at background at the site. This activity will involve detailed and accurate reporting of the sample medium for each sample collected.

The data validation activities that were performed indicate the presence of petroleum-related products, polycyclic aromatic hydrocarbons (PAHs), and phthalates; PAHs and some of the phthalates are recent additions to the list of identified compounds at the site. The PAHs might be

present because of laboratory operations at the site (PAHs are a component of some petroleum-related products) , and might be present as anthropogenic background. The phthalates are probably present as laboratory contaminants, but might be present also because of anthropogenic background at an industrial site. These are not considered to be data gaps that warrant further consideration at this time; however, they will be included in the SVOC suite as a matter of course, and the opportunity will be taken to verify that these are not contaminants of potential concern.

The data gaps identified, beyond those previously identified at the meeting with NMED, can be summarized as follows:

1. the area of the former tanks needs to be further investigated to account for the missing PID data and on the basis of recent re-analysis of chromatograms, which suggest that "motor oils" might be present in the subsurface around tanks 6 and 10.
2. former structures (culverts, berm, valve boxes, and fill ports) of DP Tank Farm that have not been previously investigated should be investigated because the Phase I sampling effort showed the presence of contamination at the chosen (biased) locations.
3. inorganics analyses should be performed to verify conclusions from the previous background comparisons (opportunity exists to do so at relatively little additional cost).
4. PAHs and phthalates should be included in the SVOC suite to verify conclusions from the previous investigations (opportunity exists to do so at relatively little additional cost).

Activities regarding investigation of the sheen proposed in the Work Plan are expected to be performed, in part, sequentially. Actual sampling locations and numbers of samples to be collected in the sheen area are not provided in the Work Plan (except as minimum numbers) because they depend on results of the planned observational field investigations.

Contingencies have been discussed broadly, mentioning possibilities that include no further action, human health and ecological risk assessment, monitoring, and/or removal. The discussion indicates that future actions of any form will depend on what the data reveal.