



Department of Energy
Field Office, Albuquerque
Los Alamos Area Office
Los Alamos, New Mexico 87544

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MAR 24 1994

*Approved
Lester LANC
and FY94*

Barbara Driscoll
RCRA Permits Branch
US Environmental Protection Agency
Region 6
1445 Ross Ave., Suite 1200
Dallas, Texas 75202-2733

OU-1071

Dear Ms. Driscoll:

DOE/LAO requests your concurrence with regard to plans for treatment of soil contaminated with total petroleum hydrocarbons (TPH) at levels above action (100 ppm) as set forth in the New Mexico Underground Storage Tank (UST) Regulations, Part 1209 (D)3(b). The contamination is associated with soil excavated above a UST which was removed at solid waste management unit (SWMU) 0-031(b) located in operable unit (OU) 1071. No hazardous constituents were found above levels of concern and soil underneath the tank was within compliance levels.

The site will be closed in accordance with NM UST regulations, and a closure certificate will be issued by the New Mexico Environment Department. However, we still request your concurrence to proceed with remediation of TPH in the excavated piles since SWMU 0-031(b) was scheduled for investigation in the approved RFI Work Plan for OU-1071.

To aide you in your assessment, we have enclosed a summary of sampling results and future plans associated with UST #2 at SWMU 0-031(b). The summary provides a two-page fact sheet plus two maps. One map gives orientation to the site and the other shows locations, depths, and results for samples taken at UST #2.

If you have any questions or concerns in the interim, please call me at (505) 665-7203, or Bonnie Koch, Scientech, at (505) 667-5793.

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Theodore J. Taylor
Program Manager
Environmental Restoration Program

MAR 31 1994



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Barbara Driscol

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MAR 24 1994

cc/w enclosure:

Kathleen Sisneros

New Mexico Environment Department
Waste Management Division
1190 St. Francis Dr., P.O. Box 26110
Santa Fe, New Mexico 87502
K. Boardman, AL-ERPO, MS A906
T. Taylor, LAAO, ES&H, MS A316
W. Spurgeon, HQ, EM-452
D. McInroy, UC-LANL, EM/ER, MS M992
T. Baca, UC-LANL, EM-DO, MS J591
K. Schenck, Scientech/LAAO, ES&H, MS A316
B. Koch, Scientech/LAAO, ES&H, MS A316
RPF, MS M707

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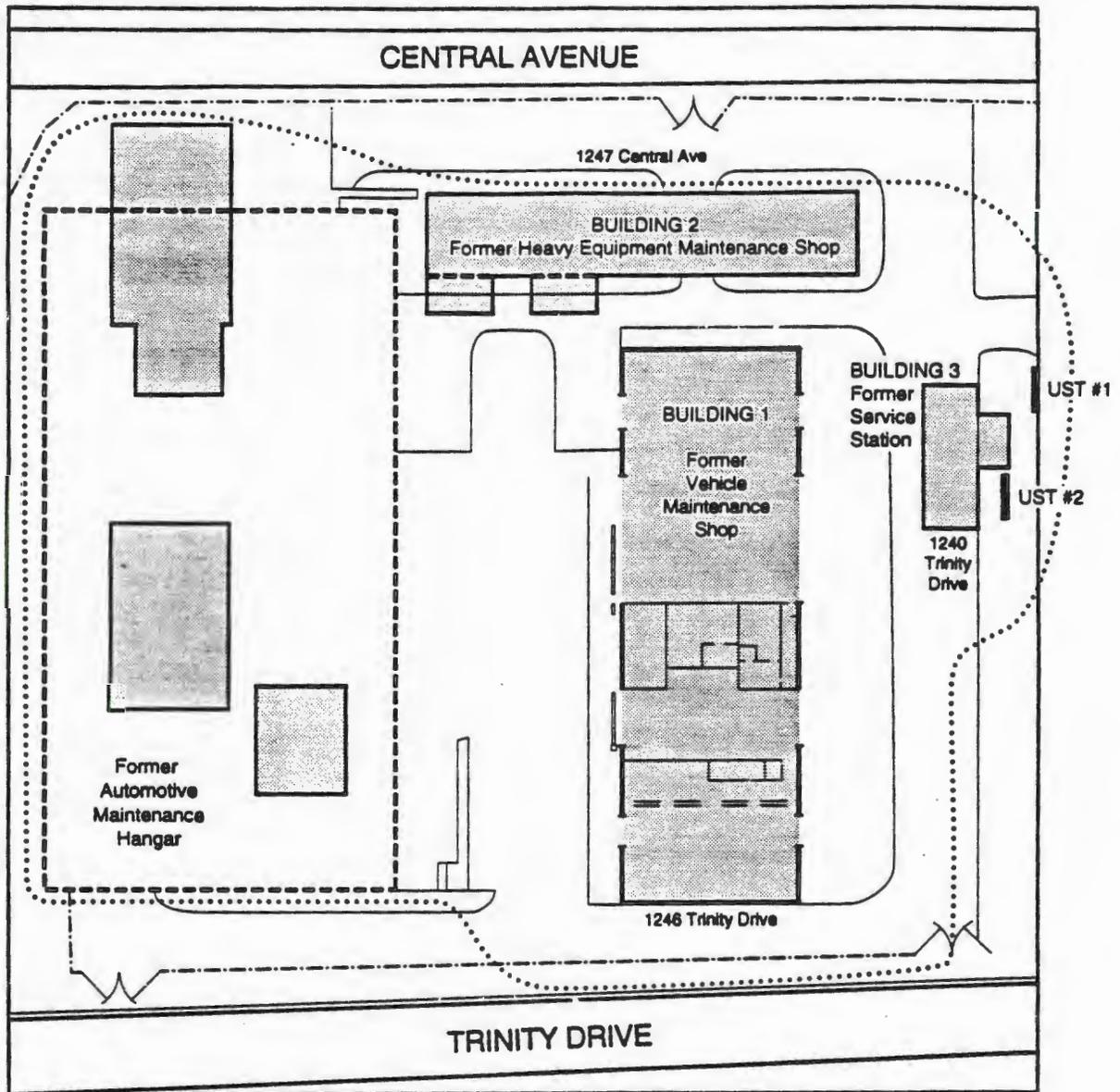
FACT SHEET: OU-1071, SWMU 0-4 (Former Motor Pool) UST REMOVAL
Results and Closure Recommendations

- According to the RFI Work Plan for OU-1071 and New Mexico Environment Department's (NMED) Underground Storage Tank Regulations (USTR), two underground storage tanks were removed from Operable Unit (OU) 1071, SWMU Aggregate 0-4 (Former Motor Pool), SWMU 0-031(b)¹. Figure 1 shows the site layout and the location of the two tanks. Tank excavation was started on March 1, 1994 and completed on March 8, 1994.
- TPH and all other constituents of concern were found to be below action levels in the soil above and underneath the north tank (UST#1). Robert Miller with NMED UST Bureau was present on-site for the removal and confirmed that UST#1 had not leaked. Because no leaks were found in this tank and the soil above and below the tank is clean, we recommend that the pit from UST#1 be refilled with the soil removed during its excavation.
- Soil excavated from above the south tank (UST#2) showed the presence of total petroleum hydrocarbons (TPH) in excess of the USTR action level of 100 ppm. As shown on the map for UST#2, TPH was found at 230 ppm at a depth of 7 ft. (sample AAA8509), or just above the tank. Contamination was confirmed by two composite samples with concentrations of 210 and 780 ppm taken from the excavated soil piles (samples AAA8540 and AAA8539, respectively). However, two samples taken from below the tank, at a depth of 12 ft., showed levels of 5 and 3 ppm (samples AAA8521 and AAA8517, respectively). Samples taken from the walls around the tank are all below the action level. The tank was inspected and found to have not leaked. Robert Miller with NMED UST Bureau confirmed this by on-site inspection during the tank's removal.
- Because the contamination is bounded vertically and horizontally and found to be associated only with the excavated fill and confined to the immediate area of the tank pit, remediation of only the excavated piles will be necessary. We propose that the pit be refilled with clean soil to restore the site. The contamination was probably created in association with spills during tank filling. These leaks are thought to have been minimal since contamination was limited to soil above UST#2.
- We propose treatment of the excavated piles after transfer off-site to Waste Management of New Mexico (WMNM) in Rio

¹The RFI Work Plan for OU-1071 indicates that three fuel tanks were suspected to be present; the geophysical investigation performed in February of 1994 showed the presence of only two tanks.

FACT SHEET for SWMU 0-031(b)
OU-1071
March 21, 1994
Page 2

Rancho (P.O. Box 15700, 402 Industrial Park Loop, Rio Rancho, NM 87174). WMNM is under contract to LANL for the handling of UST contaminated soils. According to the USTR and the New Mexico Solid Waste Management Regulations, the soil is not highly contaminated and does not require special handling. Because the NMED site inspection during removal documented the absence of significant leaks to the subsurface, NMEDs UST Bureau requires only that a certificate of receipt for the soil be obtained from WMNM for closure to be complete. A letter Henry Miller documenting his findings is being submitted to LANL.



Sources: Zia Company Z-1540, Drainage and Misc. Surfacing;
 Z-498 Additions to Work Shop Buildings Lubrication and Body Shop, 1950
 Modified by: cARTography by A. Kron 3/16/94

-  Existing building
-  Removed building
-  Underground storage tank
-  Paved road
-  Fence
-  Domain boundary

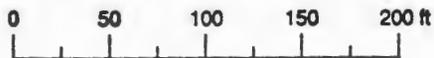
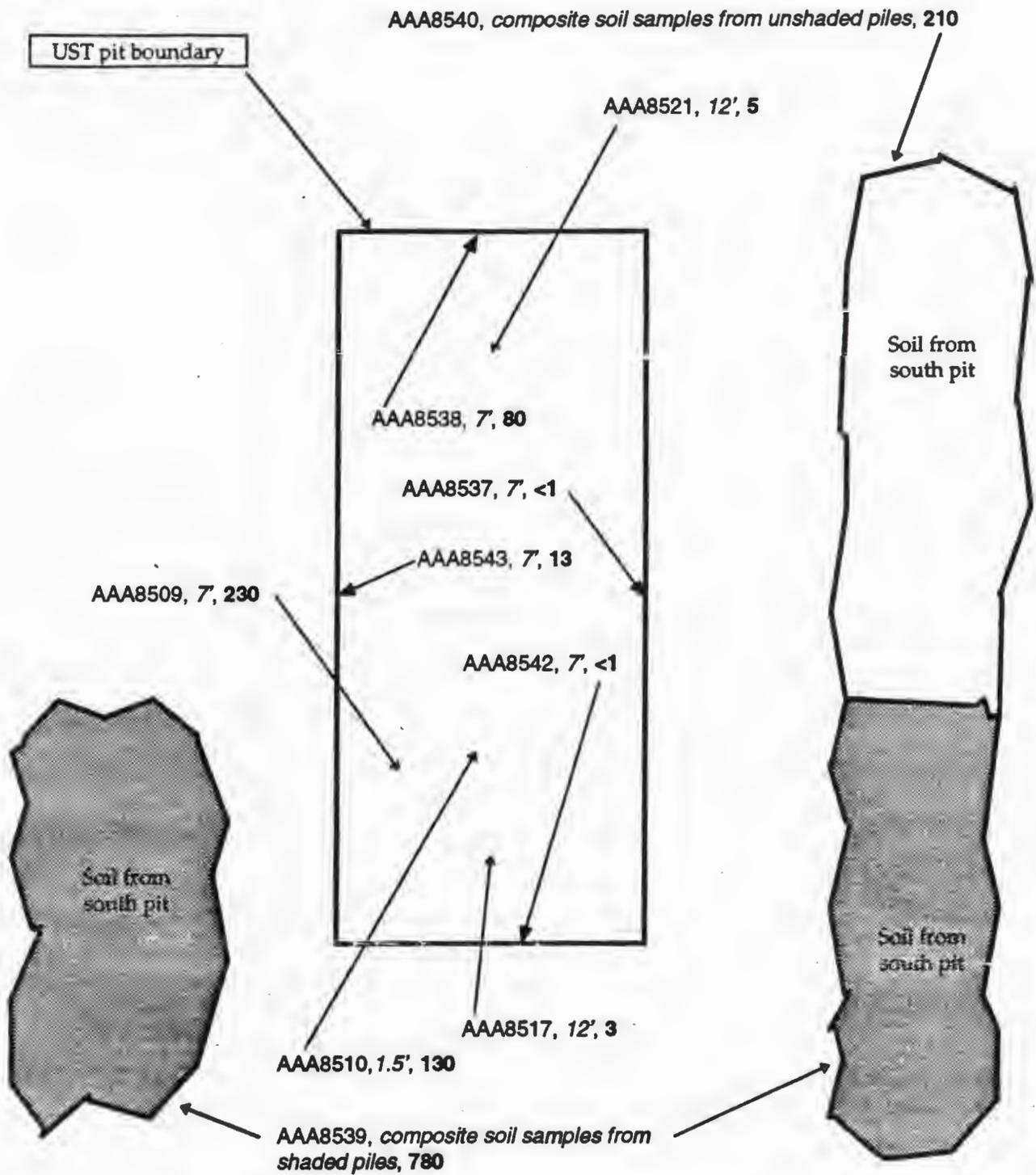


Figure 1. Locations of Shannon Corporation USTs removed March 1994.



Legend: Sample ID, Sample depth or location, Laboratory Analytical TPH level (ppm)

**OU-1071, SWMU GROUP 0-4, Former Motor Pool
UST #2 (South)
Sample Analytical Data (preliminary)**