

Memo to the File

RE: LANL Technical Area 3
Submittal of TA-3-26 Diesel Fuel Oil Contamination Tier 1 Evaluation Report
LA-UR-08-05229
August 12, 2008

The cover letter was addressed to Glenn Saums (SWQB). Among those copied was Calvin Martin (PSTB).

I downloaded and reviewed the procedures for conducting the Petroleum Storage Tank Bureau's Risk-Based Evaluation of Petroleum Releases. LANL appears to have followed the procedures in conducting the evaluation and preparing the report.

I interpreted the instructions for determining which samples to include in the averages for comparison of contaminant concentrations to Tier 1 Risk Based Screening Levels (RBSLs) a little differently. LANL used a zero value for missing data, i.e., "valid result not obtained". I did not. LANL included overall concentrations of contaminants from the full depth of the core borings. I did not include depths greater than 20 feet because it was determined by LANL that "the vertical and lateral extent of contamination has been fully defined" and "the maximum depth of detected contamination is 20 feet" (page Section 2.1 of report). My averages for comparisons to RBSLs are slightly different, but not enough to change the conclusions.

LANL used the concentrations in the shallowest samples to calculate values for soil surface. The shallowest samples were 5 feet or 10 feet. I wondered why there were no surface samples collected or analyzed. I placed a call to Calvin Martin (PSTB) (476-4390). Calvin referred me to Lorena Goerger (476-4385). I described my observations, via voice mail, to Lorena and asked if the PSTB considered the Tier 1 Evaluation to be conducted correctly. Her e-mail and my response are attached.

Based on my review and Lorena's opinion, I find no objections to the TA-3-26 Diesel Fuel Oil contamination Tier 1 Evaluation.

Pat Stewart *11/21/08*

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