

TA03 3/12/99

Los Alamos

NATIONAL LABORATORY

Hazardous & Solid Waste Group (ESH-19)

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ESH-19:99-0039

Lorena Georger
New Mexico Environment
Underground Storage Tank Bureau
1190 St. Francis Drive, P.O. Box 1663
Santa Fe, New Mexico 87502

Dear Ms. Georger:

SUBJECT: Closure of Unconfirmed Release at UST# TA-3-73

On January 12, 1999, Los Alamos National Laboratory (LANL) submitted a written notification regarding suspected releases at three underground storage tanks (USTs) designated as TA-2-1, TA-35-197 and TA-3-73. This notification was based on the presence of Total Recoverable Petroleum Hydrocarbons in samples taken during closure of these tanks in the latter months of 1998. Further investigation of these suspected release has been ongoing and some preliminary sampling results from this investigation have been transmitted to your office.

UST #TA-3-73 was a previously unregistered UST located at the TA-3 Asphalt Batch Plant operated by Johnson Controls - Northern New Mexico. It was discovered in early December and removed immediately on December 15, 1998, prior to the regulatory deadline for the upgrade or removal of USTs. There was no piping associated with the tank, which was used exclusively to store unused road oil and asphalt emulsion. Since the total capacity of the tank was approximately 330 gallons, one soil sample was taken during tank removal at a depth of approximately 16 inches below the center of the tank. Visual observations of the tank and excavation indicated that there was no apparent leakage from the structure itself. The soil sample was analyzed for Total Recoverable Petroleum Hydrocarbons (TRPH) using EPA Method 418.1 and analytical results indicated a TRPH concentration of 140 PPM. These results were verbally reported to the UST Bureau as an "unconfirmed release" on January 6, 1998, and the tank was removed and salvaged.

As we discussed during our telephone conversation on February 18th, LANL is requesting a withdrawal of its notification for a suspected release at UST #TA-3-73 based on a further investigation of the TA-3-73 site completed on February 10, 1999. This investigation included further soil excavation, sampling and visual observation had indicated that there had been extensive use of excess aggregates mixed with petroleum based asphalt, as a fill material for leveling the site surrounding the asphalt batch plant and UST #TA-3-73. This material was uniformly observed during our investigation throughout an excavated area extending approximately ten feet outward from the original tank location. Photographs of this excavation and the soil profiles exhibiting this layer of asphalt aggregate are



March 12, 1999

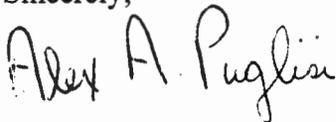
attached for your review and files. The soil interval (approx. 8.0" - 36.0") at which these materials are located directly coincides with the soil interval at which the original sample was taken during tank closure.

It is the Laboratory's belief that the TRPH contamination originally detected during the closure of UST #TA-3-73 was due to the historic use of these asphaltic materials as fill at the site. There is no evidence to indicate that the contamination was caused by leakage from the UST especially since there was no visual indication of tank leakage during closure. Additionally, the TA-3-73 site is contained in Module VIII of the Laboratory's Resource Conservation and Recovery Act (RCRA) permit as potential release site (PRS) C-3-016 and any contamination associated with this PRS will be further investigated and addressed under the provisions of that permit. Therefore, we are requesting closure of our original notice of an unconfirmed release under 20 NMAC 5.12 and your concurrence that no further action is required for closure of the UST at this site. All contaminated soil removed during excavation and sampling has been tested and will be disposed of appropriately.

We would also like to invite you to visit the site in order to make direct observations or obtain any additional information, which you may feel is necessary to make a determination on this matter. Please contact me at 667-4882 if you would like to arrange this visit or if you have any further questions regarding this matter.

Thank you for your time and assistance.

Sincerely,



Alex A. Puglisi
Hazardous & Solid Waste

AP/vh

Attachments: Photographs - Removal of UST# TA-3-73
Photographs - Investigation of Unconfirmed Release

Cy: J. Kieling, NMED/HRMB, Santa Fe
J. Vozella, DOE/LAAO, MS A316
J. Seubert, DOE/LAAO, MS A316
S. Moore, JCNNM/HENV, MS A199
L. Hartman, EM/ER, MS M992
H. Decker, LANL/ESH-18, MS K497
P. Vadaro-Charles, LANL/ESH-7, MS K999
T. Gunderson, LANL/DLD-OPS, MS A100



**TA-3-73 Release Investigation- 2/10/99.
Los Alamos National Laboratory**



Excavation of soil surrounding original UST# TA-3-73 location during confirmatory investigation.



Aggregate/asphalt mix observed in excavation surrounding UST# TA-3-73.



Aggregate/asphalt mix in soil profile of excavated area, approximately 10 feet from former tank location.

**TA-3-73 UST Permanent Closure: Tank removal on 12/15/98.
Los Alamos National Laboratory**



Temporary tank location after removal, awaiting salvage company pickup.



Close up shot of tank side, no visual indication of leakage was observed.



Tank excavation location.



Soil sample collection in center of tank excavation.