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TA03



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**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

February 16, 2005

David Gregory, Federal Project Director  
Los Alamos Site Office  
Department of Energy  
528 35<sup>th</sup> Street, Mail Stop A316  
Los Alamos, NM 87544

G. Pete Nanos, Director  
Los Alamos National Laboratory  
P.O. Box 1663, Mail Stop A100  
Los Alamos, NM 87545

**RE: REVISIONS TO SAMPLING AND ANALYSIS PLAN (SAP) FOR DIESEL FUEL CONTAMINATED SOIL AT TA-3-26 ABOVEGROUND STORAGE TANK (AST)  
LOS ALAMOS NATIONAL LABORATORY,  
EPA ID #NM0890010515**

Messrs. Gregory and Nanos:

The New Mexico Environment Department (NMED) is in receipt of the Department of Energy and the Regents of the University of California (Collectively the "Permittees"), *Sampling and Analysis Plan, Assessment of Fuel Oil Contamination Near Fuel Storage Tank TA-3-26, Revision 1* (SAP) document, dated July 15, 2003, referenced by Project Number: 9901-310. NMED has reviewed the revised SAP and has the following additional comments.

**1) Section 1.4 – Characteristics, Page 5:**

**Permittees' Statement:** "LANL ER Program lists an Area of Concern (AOC) in the area of the tank. A review of ER documentation revealed that AOC 03-036 (j) is not associated with the contamination being investigated under this plan."

**NMED Comment:** In an email dated June 30, 2003, NMED asked the Permittees to provide clarification as to the relation of Solid Waste Management Unit (SWMU) 03-036(j) to tank SM-26. Records available to NMED suggest that there is an association



5758

between SWMU 03-036 (j) and tank SM-26. Provide documentation with figures explaining how SWMU 03-036 (j) and tank SM-26 are not associated.

**2) Section 2.3 – Core Sampling, page 9:**

**Permittees' Statement:** "An engineering drawing of the tank foundation indicated the presence of only ½ inch of sand beneath the tank with a 2 inch layer of asphalt beneath the sand and 6 inches of gravel beneath the asphalt."

**NMED:** In an email dated June 30, 2003, NMED said, "The sand layer is covered by a layer of asphalt and beneath the sand layer is a gravel layer." The Permittees must clarify whether the ½ inch sand layer is beneath the asphalt or whether the asphalt is beneath the ½ inch sand layer.

**3) Section 2 – Sample Collection and Analysis, page 9:**

**NMED:** The Permittees state in Section 1.4 Site Characteristics, that "The source of the contamination has not been identified." Based on this information, the Permittees must analyze for VOCs, SVOCs, metals, PCBs, and also collect samples in accordance with footnote a, in the NMED TPH Screening Guidelines, dated June of 2003.

If contamination is not remediated to residential levels, this site will be added to the Permittees Operating Permit, per Section III.W of the proposed Consent Order. Should you have any questions, please contact Kathryn Chamberlain at (505) 428-2546.

Messrs. Gregory and Nancos  
February 16, 2005  
Page 3

Should you have any questions, please contact Kathryn Chamberlain at (505) 428-2538.

Sincerely,



John Young  
Geologist  
Hazardous Waste Bureau

JY:kc

cc: K. Chamberlain, NMED HWB  
S. Yanicak, NMED DOE OB, MS J993  
L. King, EPA 6PD-N  
K. Hargis, LANL RRES/DO, MS M591  
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D. McInroy, LANL E/ER, MS M992  
file: Reading and LANL TA-3 '05