TA-03

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Date: March 6, 2006
Refer To: ENV-WQH: 06-039

RECEIVED
MAR 2006

Ms. Katheryn Chamberlain
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Hazardous Waste Bureau
New Mexico Environment Department (NMED)
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SUBJECT: SUPPLEMENTAL SAMPLING AND ANALYSIS PLAN (SAP) FOR DIESEL CONTAMINATED SOIL NEAR THE TA-3-26 ABOVEGROUND STORAGE TANK (AST)

Dear Ms. Chamberlain:

Enclosed is a *Supplemental Sampling and Analysis Plan Defining Nature of Contamination Near Fuel Storage Tank TA-3-26* which we prepared in response to your letter of June 17, 2005. Your review comments would be greatly appreciated. We are planning to begin this additional characterization work starting approximately April 17th if other environmental requirements can be met.

Please contact Mark Haagenstad at (505) 665-2014 or Mike Saladen at (505) 665-6085 if additional information would be helpful. Please let us know if you would like to meet to discuss this additional work.

Sincerely,

Steven Rae
Group Leader
Water Quality & Hydrology Group

SR:MH/lm

5808

Enclosure: a/s

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Supplemental Sampling and Analysis Plan
Defining Nature of Contamination Near Fuel Storage Tank TA-3-26

Revision 0

March 23, 2006

Project Number: 9209-003

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List of Acronyms

AST	Aboveground Storage Tank
BTEX	Benzene, Toluene, Ethylbenzene, Xylene
DOE	Department of Energy
DRO	Diesel Range Organics
ENV-SMO	Environmental Stewardship- Sample Management Office
ENV-SWRC	Environmental Stewardship-Solid Waste Regulatory Compliance
ENV-WQH	Environmental Stewardship-Water Quality and Hydrology
EPA	Environmental Protection Agency
FM-UI	Facility Management – Utilities and Infrastructure
IWD	Integrated Work Document
KSL	KBR-Shaw-LATA
KSL-AENV	KSL Environmental Group (a.k.a. Eberline Services)
KSL-CDDO	KSL-Construction Department Department Office
KSL-HSEO	KSL-Health, Safety, and Environment Office
LANL	Los Alamos National Laboratory
ND	Non-detect
NMED	New Mexico Environment Department
NWIS-SWO	Nuclear Waste and Infrastructure Services-Solid Waste Operations
PCB	Polychlorinated Biphenyls
QA	Quality Assurance
QC	Quality Control
SAP	Sampling and Analysis Plan
SSL	Soil Screening Level
SVOC	Semi-Volatile Organic Compounds
TPH	Total Petroleum Hydrocarbons
VOC	Volatile Organic Compounds

1.0 INTRODUCTION

Eberline Services/KSL-AENV has prepared this supplemental sampling and analysis plan (SAP) to describe sampling and contaminated-material handling activities associated with soil contamination discovered near the above ground storage tank (Tank SM-26) at the TA-3 Power Plant at Los Alamos National Laboratory (LANL). Sampling and analysis is required to further define the nature of contamination at the site in response to comments received from the New Mexico Environment Department (NMED) on the TA-3-26 Diesel Fuel Oil Contamination Assessment and Characterization Report in a letter from John Young of the NMED Hazardous Waste Bureau dated June 17, 2005. Specifically, sample analysis following the protocol for petroleum hydrocarbons from an unknown source has been requested because existing site knowledge was inadequate to confirm the source of the previously detected contamination.

This SAP is organized into three main sections: project description, a work plan and quality control procedures. The work activities for this SAP include:

- Mobilization
- Drilling
- Core Sampling
- Sample Collection and Analysis
- Project Report Preparation
- Material Management

1.1 Scope of Work

The scope of work for this project is to drill five investigative boreholes, adjacent to previous boreholes, in the area around Tank SM-26 to collect soil samples for the parameters required to be analyzed at sites with contamination suspected to be from unknown sources in the NMED Soil Screening Guidelines Revision 3.0, August 2005. Specific activities to accomplish the drilling and core sampling are provided in the Work Plan Section of this document.

The purpose of this SAP is to document the objectives, rationale and procedures for collecting, analyzing, and managing environmental samples taken from this site. The objective of the sampling is to determine if there are VOC, SVOC, or PCB constituents present at locations previously identified as containing TPH contamination. Sampling methods for the investigation are in accordance with the objectives and procedures described in Chapter 1, Soil and Groundwater, Sampling and Disposal of the Guidelines For Corrective Action (New Mexico Environment Department Petroleum Storage Tank Bureau, March 13, 2000). This plan outlines the methods and procedures to collect samples and gather data of sufficient quality and quantity to adequately verify the nature of the contaminants discovered in soil to the north and west of Tank SM-26 at the TA-3 Power Plant. The project will receive appropriate LANL reviews and will be performed

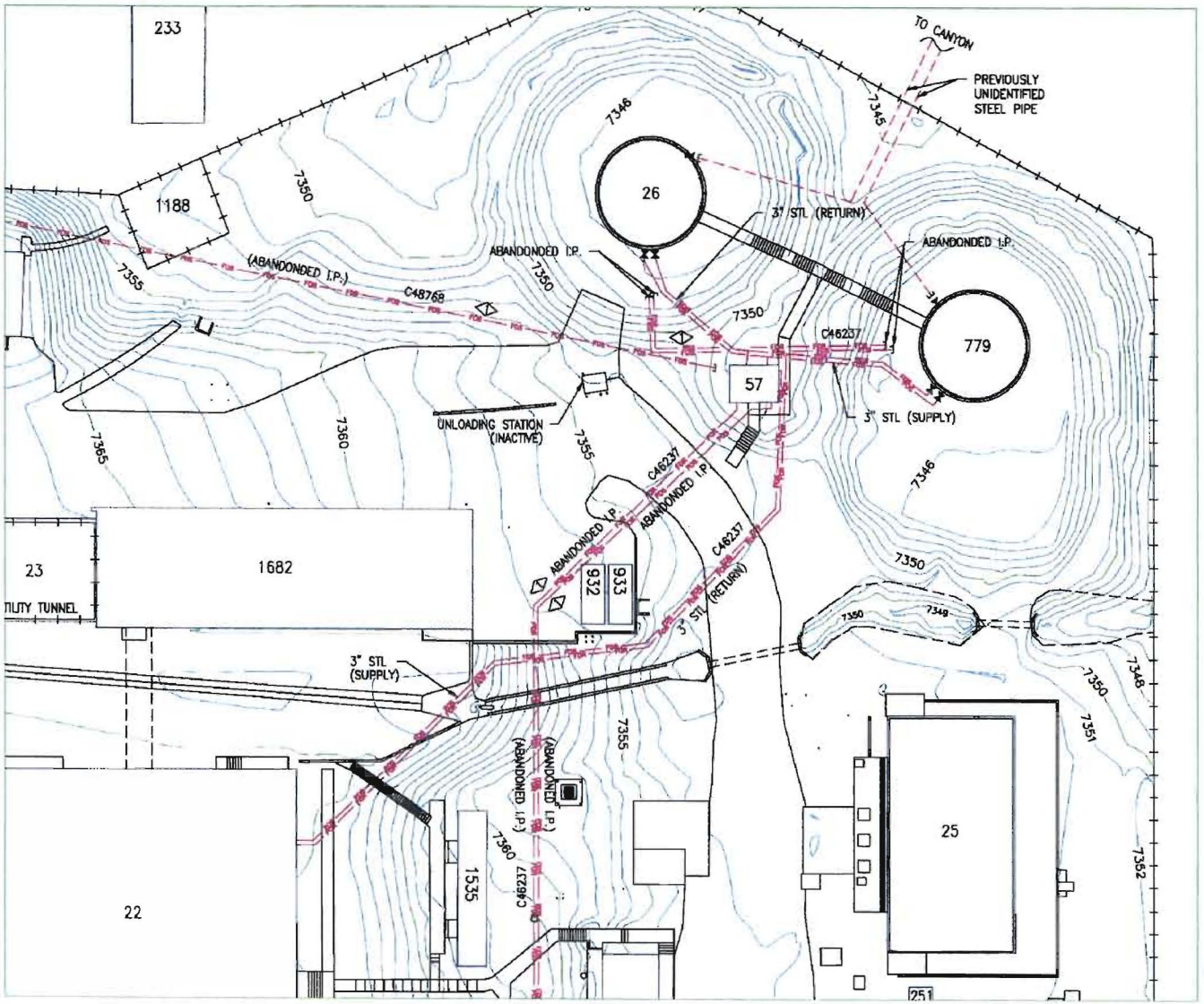
in accordance with an approved Integrated Work Document (IWD). The project will be performed in accordance with applicable Department of Energy (DOE), LANL, and NMED requirements.

1.2 Site Characteristics

A detailed description of the site, structures, operations and history is provided in the Sampling and Analysis Plan, Assessment of Fuel Oil Contamination Near Fuel Storage Tank TA-3-26. Figure 1 shows the layout of the area around TA-3-26. The contamination was initially discovered while advancing boreholes around the tank to install a cathodic protection system. Samples from the borehole cuttings were analyzed for total petroleum hydrocarbons – diesel range organics (TPH-DRO) and benzene, toluene, ethylbenzene, and xylenes (BTEX). The TPH-DRO analysis indicated diesel fuel was present on the north and west sides of the tank at levels ranging from 45 to 18,000 parts per million (ppm). Small amounts of xylene and ethylbenzene were also detected in some of the samples with xylene concentrations below 0.0650 mg/kg and ethylbenzene concentrations below 0.0162 mg/kg. Detailed results of the cathodic-protection borehole sampling and analysis are provided in the Sampling and Analysis Plan, Assessment of Fuel Oil Contamination Near Fuel Storage Tank TA-3-26.

Further investigation sampling was performed to define the extent of the contamination. The sampling was performed in accordance with the Sampling and Analysis Plan, Assessment of Fuel Oil Contamination Near Fuel Storage Tank TA-3-26. Results of the assessment sampling are provided in the TA-3-26 Diesel Fuel Oil Contamination Assessment and Characterization report. The assessment sampling indicated the horizontal profile of the contamination is contained within an area 72 feet long and 30 feet wide on the north end of the tank. The contamination is present along the backfill soil and Unit 4 interface with Unit 4 being the uppermost geologic layer of Bandelier Tuff underlying the site. The deepest contamination observed at the site was at 15-20 feet in depth at one borehole (CZ1). In all other boreholes contamination was observed at ten feet in depth while no significant contamination was seen at the 5- and 15-foot depths. Figure 2 shows the locations sampled during the assessment sampling.

The investigation into the source of the contamination revealed no ongoing fuel oil releases occurring from the tank or piping. Since no leak could be identified, NMED requested LANL conduct additional characterization because the contamination appeared to be from an unknown source and subject to the requirement to analyze the contamination for volatile organic compounds (VOC), semi-volatile organic compounds (SVOC), metals, and polychlorinated biphenyls (PCB).



Prepared for:
The Los Alamos National Laboratory

Prepared by:
KSL

FIGURE 1: TA-03-22 POWERPLANT FUEL STORAGE AREA DIAGRAM

LEGEND

- 000 — Building With Number
- Paved Road
- Dirt/Gravel Road
- Industrial Fence
- Fuel Oil Return
- Fuel Oil Supply
- Unable to Locate
- 1' Contour Interval
- 5' Contour Interval

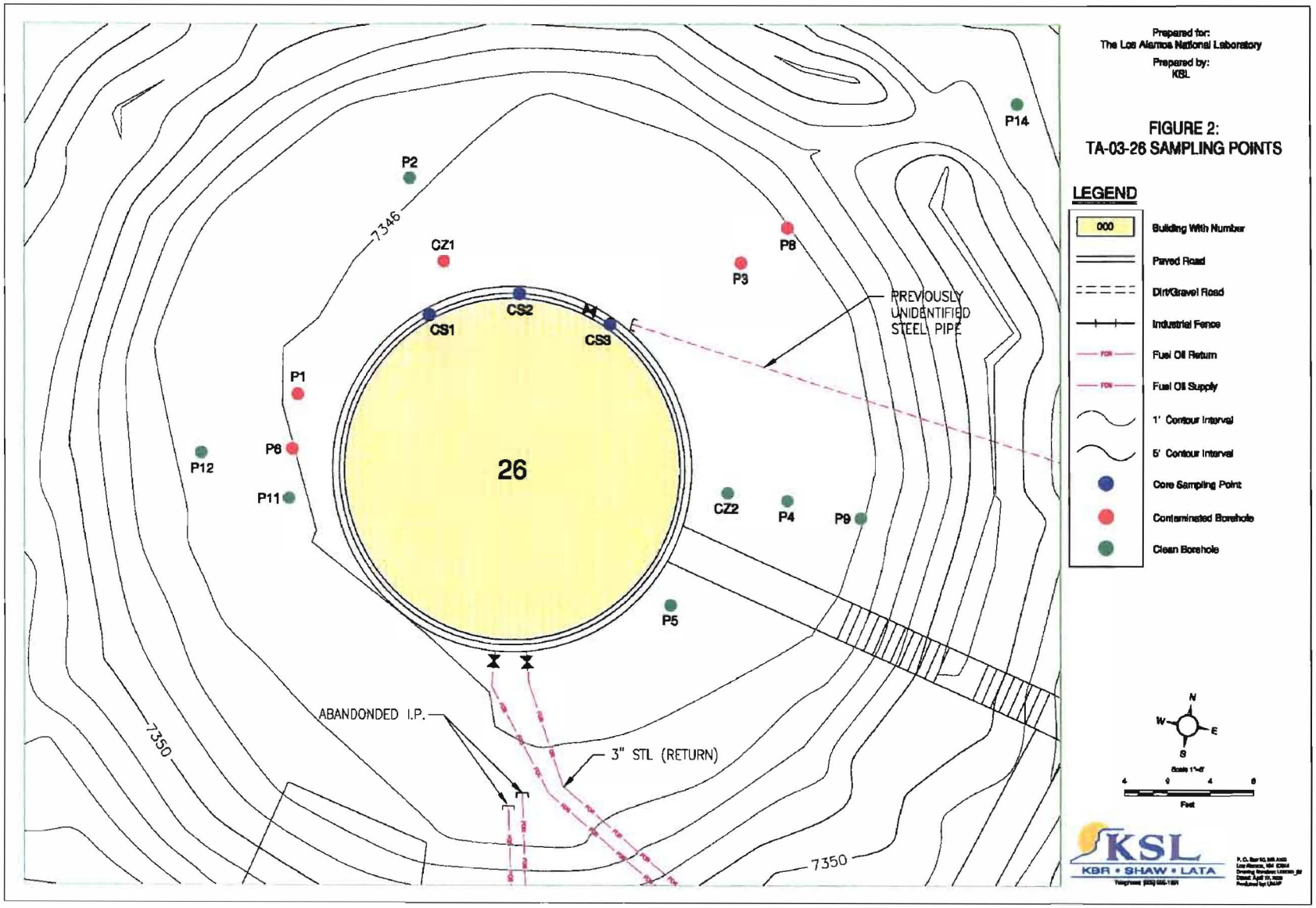
N W E S

Scale 1"=20'

10 0 10 20

Feet

KSL
KBR • SHAW • LATA


Prepared for:
The Los Alamos National Laboratory
Prepared by:
KSL
FIGURE 2:
TA-03-26 SAMPLING POINTS
LEGEND
000
Building With Number
Paved Road
Dirt/Gravel Road
Industrial Fence
Fuel Oil Return
Fuel Oil Supply
1' Contour Interval
5' Contour Interval
Core Sampling Point
Contaminated Borehole
Clean Borehole
P14
P2
7346
CZ1
P8
P3
CS2
CS1
CS3
PREVIOUSLY
UNIDENTIFIED
STEEL PIPE
P1
P6
P12
26
P11
CZ2
P4
P9
P5
ABANDONDED I.P.
3" STL (RETURN)
7350
7350
N
W
E
S
Feet
KSL
KBR • SHAW • LATA

2.0 Project Organization and Responsibilities

The following sections provide the organizational responsibilities under this SAP and the roles of key individuals in fulfilling the scope and meeting the objectives of this SAP.

2.1 Project Organization and Responsibilities

- LANL Facility Management Division (FM) - Utilities and Infrastructure Group (UI) has overall responsibility for the project.
- KSL Utility Department is responsible for managing the project and addressing issues related to working in proximity to overhead power lines that may need to be de-energized.
- Eberline Services/KSL-AENV is responsible for planning and directing of site sampling, conducting field screening, arranging for shipping of samples, laboratory analysis of samples, and reporting of results. KSL-AENV will also be responsible for waste characterization and waste management including temporary storage of the waste.
- KSL construction is responsible for any mobilization/site preparation tasks required for obtaining necessary clearances and site access.
- ENV-Sample Management Office (SMO) will provide sample containers, sample collection and control paper work, ship the samples to the laboratory, and coordinate with the laboratory through receipt of the analytical results. A contract laboratory, under subcontract to LANL, will provide analytical services.
- LANL's Water Quality & Hydrology Group (ENV-WQH) and Solid Waste Regulatory Compliance Group (ENV-SWRC) will provide institutional regulatory support for water quality issues and waste issues, respectively.
- NWIS-SWO will be responsible for waste transportation and disposal.

2.2 Key Individuals

Key project participants for this effort include the Project Manager, Site Manager, Health and Safety Officer, Sampling Personnel, Construction Supervisor. The proposed project assignments and responsibilities are provided as follows:

- Facility Manager (FM-UI) – Responsible for operations and management of this Facility.
- LANL Water Quality & Hydrology Personnel (ENV-WQH) – Responsible for institutional interface with external regulatory agencies for water quality issues, report notification and project recommendation support.
- LANL Solid Waste Regulatory Compliance (ENV-SWRC) – Responsible for institutional interface with external regulatory agencies for waste issues and project recommendation support.
- Project Manager (KSL Utilities) – Responsible for overall management of the investigation. Coordinates between internal and client organizations, manages administrative requirements, schedules, technical approach, implementation, and report preparation.

- Site Manager (Eberline Services)- Supervises all field investigation activities and is responsible for implementation of appropriate site health, safety and emergency response plans and quality control and sampling plans during the fieldwork phase of this project.
- Health and Safety Officer (KSL-HSEO) – Oversees and ensures proper implementation of the appropriate site health, safety and emergency response requirements and coordinates with the Site Manager to resolve site safety issues.
- Sampling Personnel (KSL-AENV) – Responsible for collecting soil samples from drilling boreholes and core samples for field test screening and laboratory analysis. KSL-AENV will also be responsible for waste characterization and waste management including temporary storage of the waste.
- Construction Supervisor (KSL-EP-C04)- Responsible for coordinating all construction activities pertaining to the investigation activities.
- NWIS-SWO will be responsible for waste transportation and disposal.

3.0 WORK PLAN

The following sections describe all major activities necessary to complete the sampling and analysis for determining the nature of soil contamination and preparing a report to document project activities.

3.1 Field Mobilization

Field mobilization involves all tasks required to prepare for and support fieldwork at the site. These activities include contract laboratory notification, coordination within KSL, obtaining utility clearances and excavation permits, ordering and calibrating field equipment and instrumentation, procuring decontamination equipment, preparing the site for work (i.e., setting up decontamination station and access routes), development of an IWD, and preparing this SAP. All field mobilization tasks must be complete prior to the initiation of any fieldwork or sampling activities. Tasks relative to the drilling, coring, and sampling activities are discussed within this plan.

3.2 Drilling

An auger drilling rig will be brought in to advance five continuous core boreholes with split spoon sampling to determine the nature and extent of any of the additional analytes being investigated under this SAP. A 3-inch split-spoon sampler will be used to collect the samples. Table 3-1 lists the points adjacent to which boreholes will be advanced for sampling. The table also provides the depths at which samples will be collected and the rational for the point and depths.

Table 3-1
Sample Points and Rationale

Location	Depths (feet bgs)	Rationale
CZ1	10, 15, 20	CZ1 showed the highest levels of contamination. If contaminants other than fuel oil are involved, this is where they would most likely be seen. Contamination was present at 10 and 15 feet in CZ1 but dropped below the NMED Soil Screening Level (SSL) at 20 feet. Samples at 10 and 15 feet will check for other contaminants and the sample at 20 feet will provide a vertical bound of any of the additional analytes.
CZ2	5, 10, 15	CZ2 had contaminant levels detected but below SSLs at 5 and 10 feet and no significant contamination at 15 feet. If contaminants other than fuel oil are involved they would most likely be seen at depths of 5 and 10 feet. Samples at all depths will determine if any other contaminants are present and will provide horizontal and vertical bounds of the additional analytes at the southeast edge of contamination.
P2	5, 10, 15	P2 had contaminant levels detected but below SSLs at 10 feet and no significant contamination at 5 and 15 feet. If contaminants other than fuel oil are involved they would most likely be seen at a depth of 10 feet. Samples at all depths will determine if any other contaminants are present and should provide horizontal and vertical bounds of the additional analytes at the northwest edge of contamination.
P12	5, 10, 15	P12 had no significant contamination at 5, 10, or 15 feet. Samples at all depths will show if any contamination is present and should provide horizontal and vertical bounds of the additional analytes at the northwest edge of the contamination.
P14	5, 10, 15	P14 had no significant contamination at 5, 10, or 15 feet. Samples at all depths will show if any contamination is present and should provide horizontal and vertical bounds of the additional analytes at the northeast edge of the contamination.

3.3 Sample Collection and Analysis

Table 3-2 lists the analysis to be performed on each sample along with the minimum sample size and container type and analytical methods. Additional sample containers or volumes may be required to cover contingencies at the discretion of the SMO and contract laboratory. Sample containers will be provided by the SMO.

Table 3-2
Analytical Methods and Containers

Analysis	Method	Container Size/Type
Volatile Organic Compounds	SW846 – 8260B	4 oz glass septum
Semi-Volatile Organic Compounds	SW846 – 8270C	8 oz amber glass
Metals	SW846 – 6000/7000 series	8 oz glass
Polychlorinated Biphenyls	SW846 - 8082	8 oz amber glass

Samples will be identified, labeled, handled, and preserved as specified in section 4.3.

3.4 Site Restoration

As each borehole is completed it will be covered and barricaded to prevent personnel from accidentally stepping in the hole and to prevent soil and debris from falling in the hole. Sandbags will be placed around each open borehole to prevent stormwater from entering the borehole until they can be closed. Once the determination that the boreholes are no longer needed they will be abandoned in accordance with the Chapter 3 of the NMED Petroleum Storage Tank Bureau Guidelines For Corrective Action. All sampling equipment and materials and drilling equipment will be removed from the site upon completion of the investigation. Drill cuttings and decontamination water will be handled in accordance with Section 3.6 of this document.

3.5 Project Report Preparation

Eberline Services/KSL-AENV will prepare a report summarizing the analytical results, regulatory ramifications of the results, and compliance with QC requirements. The report will contain sample collection and control documentation and analytical reports. LANL ENV-WQH will provide this information to the regulators.

3.6 Investigation Derived Waste Management

Drill cuttings and spent field analytical samples will be placed in drums for disposal. Based on past TPH-DRO analytical data, the cuttings from holes will be managed as New Mexico special waste but subject to characterization to verify this classification. All decontamination solutions generated during this assessment will also be properly characterized to ensure proper waste classification. All wastes will be profiled and disposed of through NWIS-SWO in accordance with LANL, NMED, and DOE requirements.

4.0 QUALITY CONTROL PROCEDURES

The objective of the sampling is to obtain data of sufficient quantity and quality to further define the nature of the contamination for comparison with the NMED soil screening levels. The data must be of sufficient quantity and spatially distributed such that conclusions may be drawn with respect to the nature of contamination in the subsurface. The following sections detail the equipment, personnel, and procedures that will be used to conduct the field sampling and analysis for this project. Any deviations from this plan that are deemed necessary during conduct of fieldwork will be discussed with the Project Manager (IWD will be amended as needed) and clearly documented in the field logbook. All sampling and analyses will be verified in accordance to DOE, EPA and NMED requirements.

4.1 Soil Sampling Procedures

Whenever possible, disposable sampling equipment will be used to minimize the chance of cross-contamination of samples. Borehole samples will be collected in stainless steel split spoon samplers. Soil samples will be removed from the split spoon sampler and soil probe using stainless steel scoops. All non-disposable equipment will be decontaminated in accordance with Section 4.2 prior to use

4.1.1 Analytical Samples

The sampling will consist of obtaining samples from the split spoon sampler at the depths specified. Samples will be placed directly into the sample containers and submitted to the SMO for analysis as soon as practicable after collection and within the required holding times.

4.1.2 QA/QC

In addition to field samples, field QC samples will be collected to assess the sample collection and handling techniques and the decontamination effectiveness. Field duplicate samples will be collected at a frequency of 10-percent and will be collected, handled and analyzed exactly as the original sample for which it is a duplicate. A trip blank will be included in any cooler containing samples to be analyzed for volatile organics to identify any contamination that may occur during handling or transportation of the samples.

Batch laboratory QC samples will be analyzed to assess the laboratory's performance during analysis of the samples. Any laboratory QC sample results falling outside of the acceptable limits as established in the analytical method will be explained on the analytical report and its effect on the validity of the sample results will be evaluated.

4.1.3 Data Validation

A level 4 data validation will be performed on the analytical data. Laboratory data will be checked for the following parameters to ensure validity of the data.

- Completeness – all samples and analysis have been processed.
- Detection and Quantitation Limits – Detection and quantitation limits are below the regulatory and/or action levels.
- Control Limits – Ensure that laboratory quality control sample analytical results are within acceptable control limits.
- Holding Times – Ensure that sample preparation and analysis were performed within the acceptable holding times.

4.2 Decontamination

The auger flights will be decontaminated between holes. The split spoon sampler will be decontaminated before the collection of each sample. Decontamination will consist of physically removing all gross contamination, followed by a wash with a laboratory detergent solution followed by two water rinses. Residues generated by decontamination procedures will be collected and disposed of in accordance with LANL and NMED requirements as specified in Section 3.6.

4.3 Sample Handling Protocol

When a sample is collected for off-site analysis, it will be promptly placed into a labeled sample container. The sample will be labeled with the following information.

- Unique sample identification number (including locations)
- Project number
- Date
- Time sampled
- Name of Sampler
- Requested analysis
- Preservation method,

The sample will then be sealed with custody tape, placed in a reclosable poly bag and placed on ice to cool to 4°C for delivery to the analytical laboratory within the required holding time. Pertinent information will be recorded on the sample collection log and the chain-of-custody form.

4.3.1 Custody and Shipping

Samples will be packed to prevent breakage, using additional, inert packing material as necessary. Samples will be delivered to the SMO for delivery to the analytical laboratory. If overnight storage of the samples is required, the samples will be placed, under custody, in the KSL-AENV laboratory sample refrigerator. All chain-of-custody forms will be placed into a plastic bag and attached to the cooler lid, or otherwise included with the samples, prior to pickup. Samples will be relinquished to the laboratory

representative by one of the sample team members and the transaction will be recorded on the chain-of-custody form.

4.3.2 Sample Preservation

All samples will be preserved by cooling on ice to approximately 4°C. Samples will be maintained on-site in a cooler filled with ice or blue ice. No samples will be held for more than 24 hours on site and will not exceed the required holding times.

4.3.3 Custody Seals

Custody seals are preprinted adhesive-backed seals with security slots designed to break if disturbed or tampered with. Except for VOC vials, individual sample bottles will be sealed over the cap by the person obtaining samples. Sample shipping containers (coolers, shipping boxes, etc.) will be sealed in as many places as necessary to ensure that tampering will be obvious. Seals will be signed and dated before application. On receipt at the contract laboratory, the receiving individual will check and certify that the seals on shipping containers and sample bottles are intact. Discrepancies shall be noted and communicated immediately to the SMO.

5.0 References

John Young, NMED HWB, June 17, 2005 Letter; *Comments Regarding the Sampling and Analysis Plan (SAP) for Additional Characterization of Petroleum Product Contamination Near Former TA-16-7, the TA-3-26 Diesel Fuel Oil Contamination Assessment and Characterization, and the Response to New Mexico Environment Department's (NMED) Letter Concerning the Characterization Report for the TA-21-57 Aboveground Storage Tank Diesel Fuel Oil Release Site*, New Mexico Environment Department, Santa Fe, New Mexico

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NMED, November 2005, *New Mexico Environment Department TPH Screening Guidelines*, New Mexico Environment Department, Santa Fe, New Mexico

NMED HWB and GWQB VRP, August 2005, *Technical Background Document for Development of Soil Screening Levels, Revision 3*, New Mexico Environment Department, Santa Fe, New Mexico

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