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MEMORANDUM

TO: Robert S. "Stu" Dinwiddie, Ph.D., Mgr., RCRA Permits

THRU: Ed Kelley, Ph.D., Acting Bureau Chief, SWQB

FROM: Glenn Saums, Mgr., SWQB/PSRS

DATE: April 29, 1997

SUBJECT: Recommendations Regarding Surface Water Quality Bureau (SWQB)
Concerns at PRS 21-029 also known as DP Tank Farm



Background

The original report for the DP Tank Farm (RFI Report for PRS 21-029, dated January, 1996) states that surface water runoff from DP Tank Farm drains northward into the DP Canyon channel. In addition, the RFI report indicated that during the 1994 field work, a seep of petroleum products was discovered discharging from a small area in the DP Canyon drainage directly north of the West Fill Station. Seep sediment sample results showed "weathered" diesel, and qualitative analysis indicated a potential relationship between the seep and the West Fill Station.

The DP stream channel was investigated in 1995 to determine whether the petroleum products in the seep were associated with the petroleum product contamination at the West Fill Station. Three shallow boreholes were drilled near the seep in the DP Canyon stream channel north of the West Fill Station. Also, samples of surface materials were collected at five locations along the stream bed. In addition four surface water samples were collected from the stream in DP Canyon (2 from the seep area, 1 upstream and 1 down stream of the seep).

The stream investigation indicated that TPH was present in the two boreholes drilled and sampled on the north bank of the stream channel, but not in the one drilled and sampled on the south bank. In addition, petroleum related products were not detected in the stream samples. However, it must be noted that the TPH peaks in the chromatograms for these samples were studied qualitatively and that the TPH levels from these qualitative assessments were estimated with a great deal

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of uncertainty at less than 1 ppm TPH. LANL also states in the report that they would comply with the NMED Surface Water Quality Bureau requirements regarding the area of the seep. The site was proposed for NFA.

The Final VCA Completion Report TA-21, PRS 21-029, dated August 12, 1997, contends that this completion report further justifies the DP Tank Farm site for NFA under the Hazardous and Solid Waste Amendments Module of LANL's RCRA operating permit. No further sampling was done, but post-remediation activities proposed in the VCA Report indicate that monitoring will be conducted in the stream channel adjacent to DP Tank Farm to evaluate the possibility of ***further contaminant releases***. Also, for a two year period, water sampling will be conducted **annually** and visual site inspections will be conducted **quarterly**. ***During this period, if contaminants are detected in the water course or visible signs of contamination are noted, further monitoring will be conducted.*** The report did not indicate which parameters would be sampled/monitored.

RECOMMENDATIONS

The New Mexico Water Quality Control Commission (WQCC) regulations (20 NMAC 6.2) of December 1, 1995, Section 2201 states:

No person shall dispose of any refuse in a natural watercourse or in a location and manner where there is a reasonable probability that the refuse will be moved into a natural watercourse by leaching or otherwise.

It is not necessary to further sample or monitor the stream as indicated in the Final VCA Completion Report to determine if this is a violation of Section 2201 of 20 NMAC 6.2. The seep located in the DP Canyon drainage has been identified as weathered petroleum and constitutes refuse in a watercourse. The Surface Water Quality Bureau (SWQB) recommends that this site not be granted NFA and that the seep and its source be removed from the watercourse. Verification that this has been achieved must be confirmed before the SWQB agrees to recommendation of this site for NFA.

A response to this memo is requested. If you have any questions regarding the recommendations in this memo, please call Barbara Hoditschek of my staff at 827-0596. Thank you.