

TA-21



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Date: May 28, 2003  
Refer to: ER2003-0340



Mr. John Young, Corrective Action Project Leader  
Permits Management Program  
NMED – Hazardous Waste Bureau  
2905 Rodeo Park Drive East  
Building 1  
Santa Fe, NM 87505-6303

**SUBJECT: REQUEST TO DISCONTINUE INSPECTIONS OF PETROLEUM  
HYDROCARBON SEEPS IN DP CANYON FROM DP TANK FARM, SOLID  
WASTE MANAGEMENT UNIT (SWMU) 21-029**

Dear Mr. Young:

In accordance with Compliance Order NM0890010515 issued by the New Mexico Environment Department (NMED) on June 8, 1998 for DP Tank Farm (SWMU 21-029), and Los Alamos National Laboratory's (LANL's) December 13, 2001 response to a Request for Supplemental Information (RSI) issued by NMED for the Phase II Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Report for DP Tank Farm (LANL 2001, 73436), LANL's Risk Reduction and Environmental Stewardship-Remediation (RRES-R) Program personnel have been conducting visual inspections of two petroleum hydrocarbon seeps in DP Canyon for almost four years. Based on the results of inspections conducted to date, RRES-R believes the objective of performing these inspections has been satisfied and is requesting the inspections be discontinued and no further action at SWMU 21-029 be required.

In the September 2001 Phase II RFI Report for DP Tank Farm (SWMU 21-029) (LANL 2001, 71303), LANL proposed discontinuing regular inspections of the two seeps. NMED did not concur with this proposal, in part because one of the seeps had not been discovered until March 2000. Thus, NMED believed that additional inspections were required to verify the conclusion of the Phase II RFI that the nature and extent of contamination from DP Tank Farm had been determined. In the RSI, NMED indicated that LANL should perform two years of quarterly inspections, after which LANL could propose a reduction in inspection frequency, if appropriate. LANL committed to performing these inspections in the RSI response (LANL 2001, 73436). LANL has met these inspection requirements and the results of these inspections support the conclusion that the nature and extent of contamination have been characterized.



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DP Canyon seep inspections have been conducted on a monthly or semimonthly basis since July 1999 at the "Western Seep" located directly north of the former West Fill Station and since March 2000 at the "Eastern Seep" located down gradient of DP Tank Farm. The purpose of these inspections was to document any changes in the seeps over time and correlate changes with seasonal effects and precipitation, if possible. The inspection reports have been included in the RRES-R Program Quarterly Reports to NMED. Inspection findings to date are summarized below.

- No increase in the level of contamination documented during the Phase II RFI has been observed, thus confirming that the nature and extent of contamination has been determined. Evidence of petroleum hydrocarbons is minor, if detected at all, at both the upstream and downstream seep locations, but is slightly more prevalent in the upstream seep location. Levels of visible contamination appear to have generally decreased over time.
- Petroleum-related sheens and odor appear to be more prevalent in spring and fall and less prevalent in summer and winter, but are also affected by intra-seasonal variations (e.g., unusually warm or dry periods in the winter or unusually dry periods in the summer).
- Observed seasonal affects are due to obvious physical conditions (i.e., snow and ice cover in winter and periods of high water flow due to rainfall in summer).
- Correlation of precipitation to the presence of a sheen and odor is difficult, and the timing of precipitation events relative to the inspection may be more significant than total monthly rainfall (e.g., if an inspection was conducted immediately following a precipitation event, there was typically no evidence of a sheen or odor).

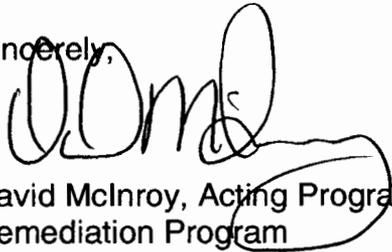
As reported in the DP Canyon reach report (LANL 1999, 63915), data from sediment and surface water samples collected within the DP Canyon stream channel both up gradient and down gradient of DP Tank Farm shows no evidence of a "signature" from the petroleum hydrocarbon contamination originating from DP Tank Farm. This conclusion was validated by data from stream channel sediment samples collected during the Phase II RFI at DP Tank Farm (SWMU 21-029), and by data from sediment and surface water samples collected as part of the Los Alamos/Pueblo Canyon Investigation.

As indicated in the RSI response, the RRES-R Canyons team has been conducting additional investigations in DP Canyon as part of the Los Alamos/Pueblo Canyon investigation. It should be noted that the DP Canyon seep investigations are not associated with corrective actions at DP Tank Farm (SWMU 21-029) and are not required to support a determination that no further action is required at this site. The RRES-R Canyons team will be evaluating all applicable data collected in DP Canyon, including DP Tank Farm Phase II RFI data from the slope and canyon bottom, and surface water and alluvial groundwater data collected as part of investigations throughout the Los Alamos watershed. Using these data, an assessment will be made of potential ecological and human-health risk in the watershed, including DP Canyon. This assessment will be presented in the Los Alamos/Pueblo Canyon Investigation Report, currently scheduled to be completed by March 2004.

In closing, completion of the inspection requirements outlined in the RSI for DP Tank Farm, assessment of data collected from the seep areas during the Phase II RFI at DP Tank Farm, and reporting of inspection and data assessment results to NMED satisfies all outstanding requirements under the Compliance Order and RSI for DP Tank Farm (SWMU 21-029).

We would be pleased to meet and discuss the contents of this letter with you at your convenience. If you have any questions or concerns regarding this request, please contact Becky Coel-Roback at (505) 667-5011 or Woody Woodworth at (505) 667-5820.

Sincerely,



David McInroy, Acting Program Manager  
Remediation Program  
Los Alamos National Laboratory

Sincerely,



David Gregory, Project Manager  
Department of Energy  
Los Alamos Site Operations

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