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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 35th 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: UPDATED CHARACTERIZATION REPORT FOR THE TA-21-57
ABOVEGROUND STORAGE TANK, DIESEL FUEL OIL RELEASE SITE
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") *TA-21-57 Aboveground Storage Tank Diesel Fuel Oil Environmental Assessment and Characterization* document, dated December 2003, referenced by LA-UR-02-4007, Revision 1, and prepared by Eberline Services/KSL-AENV. NMED has reviewed this document and concludes that the nature of contamination at this site has been fully defined, however, the Permittees have not adequately explained how they will deal with the existing diesel contamination at depth.

In this letter, the NMED has requested additional information be provided to determine how TA-21-57 Aboveground Storage Tank (AST) will be remediated. Following submittal of the additional information, NMED will identify whether any further investigation, assessment, remediation, or information is required.



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General Comments

- 1) Based on the fact that there is residual diesel contamination at depth, the Permittees must have a way of tracking this site. NMED requires that the Permittees designate this site as an Area of Concern (AOC) and add it to their permit.
- 2) The contamination concentrations at depth are a concern for potential intrusion and vapor intrusion in the future. The NMED TPH Screening Guidelines use 2200 mg/kg as the industrial direct exposure limit. The concentrations at less than 20 feet bgs in VH-1 and the angled boreholes well exceed the 2200 mg/kg limit. If this land is to be transferred at any point in the future, the residential direct exposure value (880 mg/kg) must be met.

Upon decommissioning of site 21-57 and building 21-357 (Steam Plant), soil/tuff must be removed to a depth of 20 ft bgs,

Specific Comments

- 1) **Appendix 3, Results from Vertical Coring Holes at TA-21-357 Fuel Oil Assessment Provisional Analytical Data from General Engineering Laboratories, page A3-1:**

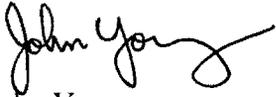
NMED Comment: This Table displays a value of 141,000 mg/kg (approximately 14%) of diesel range organics at 85 feet in VH-1. The Permittees must provide justification for not removing or treating this contamination at depth.

Additionally, the Permittees must add Diesel Range Organics (DRO) to the analytical suite at wells in the vicinity of the 21-57 AST. DRO sampling of nearby wells will ensure that the contamination has not laterally migrated. This work must be proposed in the Interim Facility Groundwater Monitoring Plan.

Messrs. Nanos & Gregory
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Should you have any questions, please contact Kathryn Chamberlain at (505) 428-2546.

Sincerely,



John Young
Geologist
Hazardous Waste Bureau

JY:kc

cc: J. Young, 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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file: Reading and LANL TA-21 '05