



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Harold Runnels Building
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, New Mexico 87502-5469
Phone (505) 827-2900 Fax (505) 827-2965

www.env.nm.gov



RYAN FLYNN
Cabinet Secretary

BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

April 29, 2016

Dan March, Manager
Laun-Dry Supply Company, Inc.
1503 12th St. NW
Albuquerque, NM 87104

RE: Comments on the Supplemental Final Site Investigation Report, Stage 1 Abatement Plan, Laun-Dry Supply Company, Albuquerque, New Mexico

Dear Mr. March:

The Ground Water Quality Bureau of the New Mexico Environment Department (NMED) has reviewed the document prepared by EA Engineering, Science, and Technology, Inc, PBC (EA) on behalf of Laun-Dry Supply Company (Laun-Dry) titled, *Supplemental Final Site Investigation Report and Semi-Annual Groundwater Monitoring Report* (FSIR) dated March 21, 2016. In the Report, Laun-Dry summarizes field investigations conducted under the Stage 1 Abatement Plan pursuant to Section 20.6.2.4106.C NMAC and interim remedial actions. NMED has the following comments on the FSIR:

General Comments

Many years of investigations into widespread groundwater impacts at Laun-Dry have resulted in an informed picture of the nature and extent of the contamination. NMED and Laun-Dry also recognize the need for additional investigations in the near future. However, for the purposes of moving forward with a Stage 2 Abatement Plan and the requisite public notification, the work completed to date will suffice at this time. As future investigations further define human health and groundwater impacts, additional characterization activities may be required.

Specific Comments

1. Section 2.1, Page 5 references Table 1 Well Construction Details. This table notes that the total depth and well screen intervals are unknown for several monitoring wells. Laun-Dry should determine the screen intervals so that groundwater data is collected appropriately from these wells.

2. Section 2.1, Page 5 lists the wells sampled during the investigation. In order to better understand groundwater impacts in the distal end of the plumes, supply and irrigation wells at the Menaul School, Sunset Memorial Cemetery and Mt. Calvary Cemetery should be incorporated into the sampling network and sampled on a semi-annual basis.
3. Section 2.2, Page 7 references results of a Passive Soil Gas Survey that have been interpreted in Section 5.0, Page 18, as indicating potential sources of chlorinated solvents in the vicinity of 5th Street and Haines Avenue. Additional characterization of soil, soil gas, and groundwater must occur to determine if this area represents additional sources or is the centerline of the plume originating from Laun-Dry.
4. Section 4.2, Page 16 references the installation of monitoring wells MW-17 through MW-19 to delineate the downgradient extent of the plume. The increasing trend and magnitude of TCE concentration detected in MW-17 indicate that the northern distal portion of the plume has not been characterized.
5. Section 4.4, Page 17 states that the Vapor Intrusion pathway is considered an incomplete human health exposure pathway. NMED does not agree that the pathway is incomplete for the site. The residential area investigated was chosen due to the potentially exposed population, not as a surrogate for the entire potentially affected area. The portion of the plume that poses a risk for vapor intrusion, as identified by groundwater concentrations that exceed the Industrial/Occupational Vapor Intrusion Screening Level for the Groundwater to Indoor Air pathway of 24.3 ug/L TCE, incorporates a large area with tens of buildings.
6. Section 5.0 states that the medial portion of the groundwater plume has been determined. NMED is concerned that the centerline of the plume has not been adequately defined between MW-5 and the RayMar wells. The southern edge of the plume by MW-5 has not been delineated.

Given the complexity at the Laun-Dry site, additional investigations will be necessary to quantify potential impacts to human health via vapor intrusion and to further define existing impacts to groundwater quality. Issues specifically identified to date include:

- evaluation of the vapor intrusion pathway for buildings along the centerline of the plume;
- further characterization of groundwater and soil vapor in medial portion of the plumes between MW-5 and the RayMar wells;
- further characterization of groundwater in the distal portion of the plume, downgradient of the RayMar wells and downgradient of MW-17; and
- the influence of pumping of irrigation wells on the distal portion of the plume; and
- a three-dimensional representation of the plumes to effectively communicate the extent of the plume to the public.

This list is not inclusive, as additional areas may be identified and included during Stage 2 activities.

Dan March, Laun-Dry
April 29, 2016
Page 3

Please submit a Stage 2 Abatement Plan proposal within 60 days of receipt of this letter.
Response to these comments may be submitted as an addendum to the FSIR.

If you have any questions, please contact Justin Ball, Project Manager, at (505) 222-9522 or
Kristie Kilgore, Team Leader, at (505) 827-2778. Thank you for your cooperation in this matter.

Sincerely,



Michelle Hunter, Chief
Ground Water Quality Bureau

xc: Pete Domenici, Jr., 320 Gold Ave. SW, Suite 1000, Albuquerque., NM 87102
PDomenici@domenicilaw.com
Teri McMillan, EA, 320 Gold Ave. SW, Suite 1210, Albuquerque, NM 87102 McMillan,
tmcmillan@eaest.com
Mary Lou Leonard, City of Albuquerque Environmental Health
Kathryn S. Becker, OGC
Kristie Kilgore, GWQB-SCP
Justin Ball, GWQB-SCP
ROS Read File

