Environmental Programs (EP)
Document Signature Form

Catalog Number: EP2013-0134

Document Title/Subject: WCSF: R-47, R-58, R-63i, CdV-9-1i

Project Manager: Steve Paris

Author: Jocelyn Buckley

Editor:

Compositor:

LA-UR-#(s): Approval signatures on final WCSF.

Date Due: 7/15/2013

Reviewer Signatures: By signing below, the reviewer indicates that he/she **reviewed** and **approves** the document.

Doc Reviewers Name (Print reviewer's name under title)	Signature	Date
Technical Reviewer		
Project Manager		
Regulatory Compliance		
Engineering		
Program Director		
DOE/LA Field Office		

36831

Waste Characterization Strategy Form

Project Title:	**R-47, R-58, R-63i, CdV-9-1i**
Area of Impact:	**TA-16**
Activity Type:	**Installation of Regional and Intermediate Wells**
Project Manager/Waste Generator:	**Steve Paris/Bennie Martinez**
LANL Waste Management Coordinator:	**Victor Garde**
Completed by:	**Jocelyn Buckley**
Date:	**July 10, 2013**

Description of Activity:

The waste-generating activities addressed in this Waste Characterization Strategy Form (WCSF) consist of the installation (i.e., drilling, collecting chip and core samples, development, groundwater sampling, and aquifer testing) of groundwater monitoring wells R-47, R-58, R-63i, and CdV-9-1i are being installed to satisfy a recommendation made in the Technical Area 16 Well Network Evaluation and Recommendations and approved by the New Mexico Environment Department (NMED) Hazardous Waste Bureau (LANL 2012, 213573; NMED 2012, 520747). See Attachment 1 for the map of well locations. The following waste streams are expected to be generated during the drilling and installation of these wells:

- Contact Waste
- Drill Cuttings
- Drilling Fluids
- Development Water
- Decontamination Fluids
- Storm water
- Residual Solids from Secondary Containments
- Drilled Out Concrete, Chips, Concrete Slurry
- Residual Concrete Washout
- Petroleum Contaminated Soils (PCS)
- Municipal Solid Waste (MSW)

Note: Waste streams generated from each well will be stored separately at each well site.

All wastes will be managed in accordance with P-409, *Waste Management*; EP-DIR-SOP-10021, *Characterization and Management of Environmental Program Waste*; P-930-1, *LANL Waste Acceptance Criteria;* P-930-2, *Waste Certification Program*, and approved work plans.

Trained and qualified Field Waste Management Technician (FWMT), Waste Sampling Personnel (SP), and Hazardous Materials Packaging and Transportation (HMPT) personnel will be assigned to perform the duties outlined in EP-DIR-SOP-10021.

This WCSF will be implemented before any waste generating activity is undertaken. An amendment to this WCSF will be prepared and submitted for review and approval if any of the waste streams change in description or characterization approach or unanticipated waste streams are generated. The generation of no path forward wastes must be approved by the Department of Energy (DOE) prior to generation of the waste.

Investigation activities will be conducted in a manner that minimizes the generation of waste. Waste minimization will be accomplished by implementing the most recent version of the "Los Alamos National Laboratory Hazardous Waste Minimization Report." Waste streams will be recycled/reused, as appropriate.

Relevant Site History and Description:

Well R-47 is being installed to augment the existing network to better define RDX contamination flow paths within the regional aquifer north of Canon de Valle. The primary purpose of R-47 is to provide groundwater monitoring for high explosives (HE) and other contaminants in the regional aquifer down gradient of the 260 Outfall and beneath infiltration pathways associated with Canon de Valle and perched groundwater systems in the area. The primary objective is to monitor water quality in the regional aquifer downgradient of HE releases from the 260 Outfall. A secondary objective is to establish water levels and gradients in the regional aquifer in this area. Another secondary objective is to determine the vertical extent of perched-intermediate groundwater, if present. The final objective is to define the hydrostratigraphy of the site, characterizing rock units that can impact contaminant pathways in both the vadose and saturated intervals.

The primary purpose of Well R-58 is to increase the overall detection efficiency of the Technical Area 16 (TA-16) monitoring network to a minimum of 95% for the high- and medium-priority sources at TA-16. Water-level data from this location will also constrain the shape of the regional water table and groundwater flow directions in this area. Information from drilling the other wells recommended in the TA-16 network evaluation report, or information from the surface geophysics will be used to refine the final drilling location of R-58 in consultation with NMED. The primary objective is to monitor water quality in the regional aquifer down gradient of the medium-priority infiltration sites in upper S-Site and Fishladder Canyons at TA-16. A secondary objective is to establish water levels and gradients in the regional aquifer in this area. The final objective is to define the hydrostratigraphy of the site, characterizing rock units that can impact contaminant migration in both the vadose and saturated intervals.

Well R-63i is being installed east of Material Disposal Area (MDA) P. the primary purpose of R-63i is to monitor contaminant releases from the 260 Outfall and MDA P as well as recharge from Canon de Valle. Water–level data from this location will also constrain the shape of the lower deep-intermediate aquifer and groundwater flow directions in this area. The primary objective is to monitor water quality in the lower deep-intermediate zone of saturation downgradient of the 260 Outfall and MDA P, at Technical Area 16 (TA-16). A secondary objective is to establish water levels and gradients in the lower deep-intermediate saturated zone in this area.

CdV-9-1(i) will be installed in a target zone based on information obtained during drilling of the well and from drilling of regional aquifer well R-47. A final location for well CdV-9-1(i) will be based on data collected during installation of R-47 and the direct current-resistivity survey proposed for Canon de Valle. The primary purpose of CdV-9-1(i) is to monitor contaminants associated with Consolidated Unit 16-021(c)-99 (also known as the 260 Outfall). The primary objective is to characterize the deep-perched zone of saturation and to monitor groundwater quality downgradient of the 260 Outfall at TA-16. A secondary objective is to establish water levels and gradients in the deep-perched saturated zone in this area.

This region of the Laboratory was used for weapons testing, explosives testing, and explosives production and received effluent from outfalls containing explosives compounds, metals, and volatile organic compounds (VOCs). Storm water runoff from firing sites, open burn/open detonation units, surface disposal sites, solid waste management units, and areas of concern may have contributed to the contamination detected within the watershed. The contaminants detected in soil, rock, and sediment samples obtained from various locations within the watershed during previous investigations include barium and other Resource Conservation and Recovery Act (RCRA) metals, explosives compounds, VOCs, and radionuclides (not addressed under the Consent Order). The technical areas (TAs) located within this watershed include TA-08, TA-09, TA-11, TA-14, TA-15, TA-16, TA-28, TA-36, TA-37, TA-39, TA-49, TA-68, TA-70, and TA-71. Given the location of the wells, the following TAs are relevant:

- TA-08, also known as GT Site or old Anchor Ranch West Site, is a dynamic testing site that serves LANL. Capability is maintained in all modern nondestructive testing techniques for ensuring the quality of material in items ranging from test weapons components to high-pressure dies and molds. There are 13 SWMUs/AOCs located at TA-08. Previous due diligence efforts associated with these SWMUs and AOCs do not indicate the presence of potentially listed sources. In addition, the site slopes to the east and drains into the Pajarito Canyon system. The former operations and the SWMUs/AOCs at TA-08 are not a potential source for listed contaminants.

- TA-09, Anchor Ranch East Site, is located on the western edge of LANL and is used to explore fabrication feasibility and physical properties of explosives and investigate new organic compounds for possible use as

explosives. There are 24 SWMUs/AOCs located at TA-09. Previous due diligence efforts associated with these SWMUs and AOCs do not indicate the presence of potentially listed sources. In addition, the site slopes to the east and drains into the Pajarito Canyon system. The former operations and the SWMUs/AOCs at TA-09 are not a potential source for listed contaminants.

- TA-14 is one of five major firing sites at LANL that is used for HE testing. Most operations are remotely controlled involving detonations, certain types of HE machining, permitted burning, and other research. There are 21 SWMUs/AOCs located at TA-14 that were evaluated as potential sources. Previous due diligence efforts associated with these SWMUs and AOCs do not indicate the presence of potentially listed sources. The former operations and the SWMUs/AOCs at TA-14 are not a potential source for listed contaminants.

- TA-16 is an active HE manufacturing area. Facilities located along the north side of Water Canyon include an administrative area, a tritium facility, and HE pressing, assembly, metal forming, and powder inspection areas. There are 184 SWMUs associated with operations at TA-16. Previous due diligence efforts associated with these SWMUs and AOCs have identified that **there is a listed source** at the Consolidated Unit 16-021(c)-99 (260 Outfall) for the F001, F002, F003, and F005 listed solvents. However, **an NMED-approved "contained-in"** letter is attached to this WCSF and covers the above-mentioned waste codes [See Attachments 2 and 3].

CHARACTERIZATION STRATEGY

The characterization strategy for investigation derived waste (IDW) generated during sampling of drilling waste is based upon direct sampling of the waste and/or acceptable knowledge (AK) data/documentation associated with the sampling location. AK includes review of existing analytical data (i.e., soil, sediment, cuttings, and groundwater data) in the vicinity of the sampling locations, historical documentation associated with nearby AOCs or SWMUs (i.e., RFI Work Plans, Investigation Reports, Sediment Canyon Investigation Report, etc.), and may also include source term/process identification performed to identify whether listed hazardous waste may be present (i.e., due diligence review).

The selection of waste containers will be based on U.S. Department of Transportation requirements, waste types, and estimated volumes of waste to be generated. Immediately following containerization, each waste container will be individually labeled with a unique container identification number and with information regarding waste classification, contents, and date generated. A waste determination must be made within 45 days of the generation of the waste. A Waste Acceptance Criteria (WAC) waste exception form (WEF) can be used if the generator does not meet the 45 day deadline.

Based upon analytical data of groundwater from nearby wells and due diligence, there is a listed source at CU 16-021(c)-99 (260 Outfall); however, if RDX/HMX is *not* present in the groundwater and there are potentially F-listed constituents detected, then the source is *not* the listed source at CU 16-021(c)-99 (260 Outfall) and the waste may be managed as non-hazardous, if it does not exhibit a characteristic. An NMED-approved "contained-in" letter for CU 16-021(c)-99 is attached to this WCSF and covers the following waste codes: F001, F002, F003, and F005 [Refer to Attachment 2 ("Contained-In" Request) and Attachment 3 ("Contained-In" Approval Letter)]. If RDX/HMX is present in the groundwater and there are constituents detected that fall under the above-mentioned codes, then the waste stream may be managed as non-hazardous, because of the NMED-approved contained-in, and does not exhibit a characteristic. There is no evidence of other listed sources, and there are no records indicating that a pure chemical was disposed of or spilled within the vicinity of the well.

A copy of either the WM-PROG approved due diligence or the NMED contained-in approval letter must accompany all waste profiles prepared for the subject waste(s).

Waste streams generated from each well will be stored separately at the well location.

Waste # 1 - Contact Waste: This waste stream is comprised of solid waste generated during well installation activities that has come into contact with contaminated environmental media and equipment. This includes, but is not limited to: PPE (e.g., gloves); plastic sheeting (e.g., tarps, liners); plastic and glass sample bottles; disposable sampling supplies (e.g., filters, tubing, plastic bags); and dry decontamination wastes, such as paper items. It is estimated that less than 25 yd^3 of contact waste may be generated at each well.

Anticipated Regulatory Status: Green is Clean (GIC); Hazardous, Municipal Solid Waste (MSW) (non-hazardous/non-radiological), LLW, or MLLW

Characterization Approach: Contact waste will be characterized using the AK of the environmental media (i.e., drill cuttings and drilling fluids) with which it came into contact.

Storage and Disposal Method: Contact waste will initially be stored as non-hazardous/non-radiological waste. If approval is granted by WM-PROG, it may be recycled and reused via the Material Recycling Facility (MRF). Otherwise, the contact will be disposed of at an appropriate waste disposal facility.

Waste # 2 – Drill Cuttings: This waste stream is comprised of borehole cuttings and core, soil, and rock sediments produced during drilling. The cuttings may or may not contain residue of drilling additives. It is estimated that a total of 70 yd^3 of drill cuttings will be generated at each well.

Anticipated Regulatory Status: Reusable (land applied), LLW, Hazardous, MLLW, and Industrial

Characterization Approach: Drill cuttings will be characterized based upon the analytical results obtained from direct sampling. A representative sample of the cuttings will be taken within 10 days of well completion. A waste determination will be made within 45 days of waste generation (i.e., the date the cuttings were removed from the pit and first placed into a container, or the date of initial placement into an approved container). A 30-day turnaround time will be required for analysis. Samples can be collected one of the following ways:

1. After the fluids have been either evaporated or removed from the pit, collect the sample in accordance with EP-SOP-06.10, *Hand Auger and Thin-Wall Tube Sampler,* using a systematic grid sampling (minimum of 20 grids) as described in Section 5.2 of the RCRA Waste Sampling Draft Technical Guidance (EPA 530-D-02-002, August 2002, http://www.epa.gove/osw/hazard/testmethods/sw846/pdfs/rwsdtf.pdf). Collect an incremental sample from each grid by boring through the entire depth of the cuttings. Combine the increments into a single sample for the pit. If a hand auger or thin-wall tube sampler is not an appropriate sampling device, select the appropriate tools described in Table 8 of Section 7.1.3 of the EPA guidance, and operate the sampling device in accordance with Appendix E of the guidance.

2. Collect an aliquot of drill cuttings during the drilling operations (incremental sampling) by diverting the material to a smaller container (i.e., clean 55-gallon drum) that can then be sampled for analysis in accordance with EP-SOP-06.10. This method is not applicable for VOC analysis (read note, below, for VOC sampling). After the samples are collected from the smaller container, the residual cuttings may be placed into the pit with the rest of the cuttings produced during drilling. Due to sampling time constraints and safety issues, Sampling Method #2 is the preferred method for drill cuttings sampling.

> **NOTE:** If incremental sampling is used for drill cuttings sampling, a VOC sample will be taken at three stages: 1) A sample must be collected upon initial placement of the cuttings in the sample collection container, 2) A second sample should be collected during the middle of the incremental sampling process, and 3) A third sample must be collected after the final placement of the cuttings in the sample collection container.

Samples will at a minimum be analyzed for TAL metals; radionuclides (by alpha and gamma spectroscopy); isotopic uranium, isotopic plutonium, americium-241, tritium, and strontium-90; volatile organic compounds (VOCs); semi-volatile organic compounds (SVOCs); PCB; cyanide; nitrates/nitrites; perchlorates; and pesticides/herbicides. Toxicity characteristic leaching procedure (TCLP) analysis may also be performed for TAL metals if the analytical results for the total metals divided by 20 indicate contaminants that exceed regulatory thresholds. Total petroleum hydrocarbons (TPH) will be analyzed if staining is observed. Other constituents may be analyzed as necessary to meet the WAC of the disposal facility.

Sampling personnel must record sampling information in accordance with EP-SOP-12.01, *Field Logging, Handling, and Documentation of Borehole Materials*, EP-SOP-12.02, *Transportation and Admittance of Borehole Materials to the Field Support Facility*, and EP-SOP-5181, *Notebook and Logbook Documentation for Environmental Directorate Technical and Field Activities*. The Field notebook or sample collection sheet must be used to document sample collection activities (e.g., equipment and sampling methods used, number and location of samples, etc.). Sampling personnel must also record field conditions, problems encountered, local sources of contamination (e.g., operating

generators or vehicles), the personnel involved, equipment and supplies used, waste generated, and field observations.

Storage and Disposal Method: Drill cuttings will initially be stored in lined pits within the project-controlled area at the well, pending review of analytical results to determine final waste characterization. Specifications for the cuttings pit will be in accordance with the approved Storm Water Pollution Prevention Plan. Based upon validated analytical data, the drill cuttings will be evaluated, using the Automated Waste Determination (AWD) system, for land application in accordance with WM-PROG-QP-011, *Land Application of Drill Cuttings*. If the cuttings meet the criteria for land application, the pit liner will be removed and managed as contact waste and the drill cuttings will be land applied in accordance with WM-PROG-QP-011. If the analytical data and due diligence documentation show that the cuttings are hazardous wastes (i.e., contain constituents from a listed source), which is not anticipated, but meet all of the other land application criteria, they will be left in the pit pending approval of a "contained in" from the NMED for the potentially listed constituents. WM-PROG must be notified on or before day 70 of the need for a "contained in" request so that approval may be obtained from NMED.

If the cuttings are characterized as LLW (exceeding the land application criteria) they will be removed from the pit, containerized, and managed in a radioactive waste staging or storage area until they can be shipped for disposal. If the cuttings are characterized as Hazardous or MLLW they will be containerized (with a start date equal to the date the cuttings were containerized) and managed in a less than 90-Day Storage Area until they can be shipped for disposal. Any drill cuttings that cannot be land applied will be managed and disposed of based upon the regulatory classification of the waste at a LANL approved disposal facility.

Waste # 3 – Drilling Fluids: This waste stream is comprised of potable water, from a municipal water well, that is introduced into and retrieved from the borehole during drilling; mixing with groundwater may occur if water bearing formations are encountered. Drilling fluids may or may not contain drilling additives. It is estimated that a total of 5,000 gallons of drilling fluids will be generated at each well.

Anticipated Regulatory Status: Reusable (land applied), LLW, Hazardous, MLLW, and Industrial

Characterization Approach: Drilling fluids will be characterized based upon the analytical results obtained from direct sampling. A representative sample of the fluids will be taken within 10 days of well completion. A waste determination will be made within 45 days of waste generation (i.e., the date the fluids were removed from the pit and first placed into a container, or the date of initial placement into an approved container). A 30-day turnaround time will be required for analysis. Samples can be collected one of the following ways:

1. Collect a composite sample from the pit at intervals across the entire water column (surface, middle, and bottom). Stratified, vertical sampling is necessary to address NMED's concerns about stratification of contaminants in the pit. NOTE: If the water freezes, leaving a thin film of ice at the top, a composite sample may still be taken by breaking through the thin film, as long as the stratified vertical composite sampling is maintained. The methods available to sample a pit at varying depths include the following:

    - Geotech pump with tubing attached to a weight or pole
    - Bomb sampler
    - COLIWASA liquid waste sampler
    - Thief sampler
    - Bailer depending upon depth of container

    Samples will be collected in accordance with EP-DIV-SOP-20014, *COLIWASA Sampler for Liquids and Slurries* or subcontractor equivalent procedure. If the SOP is not used, the type of sampling equipment and methods used will be consistent with EPA 530-D-02-002.

2. Collect an aliquot of drilling fluids during the drilling operations (incremental sampling) by diverting the material to a smaller container (i.e., clean 55-gallon drum) that can then be sampled for analysis in accordance with EP-DIV-SOP-20014 or subcontractor equivalent procedure. If the SOP is not used, the type of sampling

equipment and methods used will be consistent with the EPA 530-D-02-002. If incremental sampling is used for drilling fluids sampling, a VOC and SVOC sample will be taken each time the material is diverted into the smaller container (i.e., 55-gallon drum) and analyzed immediately, instead of waiting until all the aliquots have been collected. Sample method #2 is the preferred method because of safety issues in accessing the pit.

Samples will at a minimum be analyzed for TAL metals; radionuclides (by alpha and gamma spectroscopy); isotopic uranium, isotopic plutonium, americium-241, tritium, and strontium-90; volatile organic compounds (VOCs); semi-volatile organic compounds (SVOCs); oil/grease; Total Suspended Solids (TSS); pH; explosive compounds; PCB; cyanide; nitrates/nitrites; perchlorates; and pesticides/herbicides. Toxicity characteristic leaching procedure (TCLP) analysis may also be performed for TAL metals if the analytical results for the total metals divided by 20 indicate contaminants that exceed regulatory thresholds. Total petroleum hydrocarbons (TPH) will be analyzed if staining is observed. Other constituents may be analyzed as necessary to meet the WAC of the disposal facility.

Sampling personnel must record sampling information in accordance with EP-SOP-12.01, *Field Logging, Handling, and Documentation of Borehole Materials*, EP-SOP-12.02, *Transportation and Admittance of Borehole Materials to the Field Support Facility*, and EP-SOP-5181, *Notebook and Logbook Documentation for Environmental Directorate Technical and Field Activities*. The Field notebook or sample collection sheet must be used to document sample collection activities (e.g., equipment and sampling methods used, number and location of samples, etc.). Sampling personnel must also record field conditions, problems encountered, local sources of contamination (e.g., operating generators or vehicles), the personnel involved, equipment and supplies used, waste generated, and field observations.

Storage and Disposal Method: Drilling fluids will initially be stored in lined pits within the project-controlled area at the well, pending review of analytical results to determine final waste characterization. Specifications for the pit will be in accordance with the approved Storm Water Pollution Prevention Plan. Based upon validated analytical data, the drilling fluids will be evaluated, using the AWD system, for land application in accordance with ENV-QP-010, *Land Application of Groundwater*. If the drilling fluids meet the criteria for land application, the pit liner will be removed and managed as contact waste and the drilling fluids will be land applied in accordance with ENV-QP-010. If the analytical data and due diligence documentation show that the drilling fluids are hazardous wastes (i.e., contain constituents from a listed source), which is not anticipated, but meet all of the other land application criteria, they will be left in the pit pending approval of a "contained in" from the NMED for the potentially listed constituents. WM-PROG must be notified on or before day 70 of the need for a "contained in" request so that approval may be obtained from NMED.

If the drilling fluids are characterized as LLW (exceeding the land application criteria) they will be removed from the pit, containerized, and managed in a radioactive waste staging or storage area until they can be shipped for disposal. If the drilling fluids are characterized as Hazardous or MLLW they will be containerized (with a start date equal to the date the fluids were containerized) and managed in a less than 90-Day Storage Area until they can be shipped for disposal. Any drilling fluids that cannot be land applied will be managed and disposed of based upon the regulatory classification of the waste at a LANL approved disposal facility.

Alternatively, if the drilling fluids are characterized as non-hazardous, but cannot be land applied, the fluids may be evaporated using pit sprinklers.

Waste # 4 – Development/Purge Water: This waste stream is comprised of groundwater generated during development of the well and aquifer testing. The anticipated volume of development water that will be generated is approximately 5,000 gallons for each well.

Anticipated Regulatory Status: Reusable (land applied), LLW, Hazardous, MLLW, Industrial, SWWS, or RLWTF

Characterization Approach: Development water will be characterized based upon the analytical results obtained from direct sampling. A representative sample of the water will be taken within 10 days of well completion. A waste determination will be made within 45 days of waste generation (i.e., the date of initial placement into an approved container). A 30-day turnaround time will be required for analysis. Samples can be collected one of the following ways:

1. Collect a composite sample from the container/tank at intervals across the entire water column (surface, middle, and bottom). Stratified, vertical sampling is necessary to address NMED's concerns about stratification of contaminants in the tank. NOTE: If the water freezes, leaving a thin film of ice at the top, a composite sample may still be taken by breaking through the thin film, as long as the stratified vertical

composite sampling is maintained. The methods available to sample a tank at varying depths include the following:

- Geotech pump with tubing attached to a weight or pole
- Bomb sampler
- COLIWASA liquid waste sampler
- Thief sampler
- Bailer depending upon depth of container

Samples will be collected in accordance with EP-DIV-SOP-20014 or subcontractor equivalent procedure. If the SOP is not used, the type of sampling equipment and methods used will be consistent with EPA 530-D-02-002.

2. Collect an aliquot of development water as it is generated (incremental sampling) by diverting the material to a smaller container (i.e., clean 55-gallon drum) that can then be sampled for analysis in accordance with LANL EP-DIV-SOP-20014 or subcontractor equivalent procedure. If the SOP is not used, the type of sampling equipment and methods used will be consistent with the EPA 530-D-02-002.

Samples will at a minimum be analyzed for TAL metals; radionuclides (by alpha and gamma spectroscopy); isotopic uranium, isotopic plutonium, americium-241, tritium, and strontium-90; volatile organic compounds (VOCs); semi-volatile organic compounds (SVOCs); oil/grease; Total Suspended Solids (TSS); pH; explosive compounds; PCB; cyanide; nitrates/nitrites; perchlorates; and pesticides/herbicides. Toxicity characteristic leaching procedure (TCLP) analysis may also be performed for TAL metals if the analytical results for the total metals divided by 20 indicate contaminants that exceed regulatory thresholds. Total petroleum hydrocarbons (TPH) will be analyzed if staining is observed. Other constituents may be analyzed as necessary to meet the WAC of the disposal facility.

Sampling personnel must record sampling information in accordance with EP-SOP-12.01, *Field Logging, Handling, and Documentation of Borehole Materials*, EP-SOP-12.02, *Transportation and Admittance of Borehole Materials to the Field Support Facility*, and EP-SOP-5181, *Notebook and Logbook Documentation for Environmental Directorate Technical and Field Activities*. The Field notebook or sample collection sheet must be used to document sample collection activities (e.g., equipment and sampling methods used, number and location of samples, etc.). Sampling personnel must also record field conditions, problems encountered, local sources of contamination (e.g., operating generators or vehicles), the personnel involved, equipment and supplies used, waste generated, and field observations.

***Storage and Disposal Method*:** Development water will be containerized at the point of generation and initially managed in a <90 Day storage area as hazardous waste, pending analysis. Based upon validated analytical data, the development water will be evaluated, using the AWD system, for land application in accordance with ENV-QP-010. If the development water meets the criteria for land application it will be land applied in accordance with ENV -QP-010. If the analytical data and due diligence documentation show that the development water is hazardous wastes (i.e., contain constituents from a listed source), which is not anticipated, but meet all of the other land application criteria, they will be managed as non-hazardous/non-radioactive pending approval of a "contained in" from the NMED for the potentially listed constituents. WM-PROG must be notified on or before day 70 of the need for a "contained in" request so that approval may be obtained from NMED.

If the development water is characterized as LLW (exceeding the land application criteria) it will be managed in a radioactive waste staging or storage area it can be shipped for disposal. If the development water is characterized as Hazardous or MLLW (with D-codes for characteristic waste) it will be managed in a less than 90-Day Storage Area (with a start date equal to the earliest date of generation by container) until it can be shipped for disposal. Any development water that cannot be land applied will be managed and disposed of based upon the regulatory classification of the waste at a LANL approved disposal facility.

Waste # 5 – Decontamination Fluids: This waste stream consists of liquid wastes (e.g., water, water & Alconox) generated from the decontamination of excavation, sampling, and drilling equipment. Every attempt will be

made to limit the volume of this waste stream by using dry decontamination methods, where applicable. It is estimated that approximately 500 gallons of decontamination water will be generated at each well location.

> **NOTE #1:** Decontamination fluids that include surfactants (e.g., Alconox) can be difficult to dispose of if the analytical results indicate a Chemical Oxygen Demand (COD) that exceeds the RLWTF WAC of 250 mg/L (P930-1, Attachment 13, 1.4.4). Surfactants are acceptable to use in decontamination solutions but in limited quantities (not in excess of manufacturer recommendations or less than 0.2% by weight).

> **NOTE #2:** Decontamination of drill rigs, augers, and other equipment using water/steam typically results in a waste stream that is comprised of both solids and liquids. The solids are addressed as Waste #7 and must be segregated (within reason) from the bulk decontamination water so that the Total Suspended Solids (TSSs) do not exceed the RLWTF WAC of 10,000 mg/L (*P930-1, Attachment 13;* 1.5).

Anticipated Regulatory Status: LLW, Hazardous, MLLW, Industrial, SWWS, or RLWTF

Characterization Approach: Decontamination fluids will be characterized based upon the AK of the media with which it came into contact and/or using the analytical results obtained from direct sampling. Samples, if needed to meet a disposal facility WAC or due to poor AK, will be collected in accordance with EP-DIV-SOP-20014, *COLIWASA Sampler for Liquids and Slurries* or subcontractor equivalent procedure. If the SOP is not used, the type of sampling equipment and methods used will be consistent with EPA 530-D-02-002. A representative sample will be taken within 10 days of generation (i.e., date of initial placement into container) so that a waste determination can be made within 45 days of generation and wastes disposed within 90 days, if necessary. All samples will be submitted with a 30-day turnaround time for analyses. Multiple sampling events may be required to ensure WAC requirements are met.

Samples will at a minimum be analyzed for TAL metals; radionuclides (by alpha and gamma spectroscopy); isotopic uranium, isotopic plutonium, americium-241, tritium, and strontium-90; volatile organic compounds (VOCs); semi-volatile organic compounds (SVOCs); oil/grease; Total Suspended Solids (TSS); pH; explosive compounds; PCB; cyanide; nitrates/nitrites; perchlorates; and pesticides/herbicides. Toxicity characteristic leaching procedure (TCLP) analysis may also be performed for TAL metals if the analytical results for the total metals divided by 20 indicate contaminants that exceed regulatory thresholds. Total petroleum hydrocarbons (TPH) will be analyzed if staining is observed. Other constituents may be analyzed as necessary to meet the WAC of the disposal facility.

Sampling personnel must record sampling information in accordance with EP-SOP-12.01, *Field Logging, Handling, and Documentation of Borehole Materials*, EP-SOP-12.02, *Transportation and Admittance of Borehole Materials to the Field Support Facility*, and EP-SOP-5181, *Notebook and Logbook Documentation for Environmental Directorate Technical and Field Activities*. The Field notebook or sample collection sheet must be used to document sample collection activities (e.g., equipment and sampling methods used, number and location of samples, etc.). Sampling personnel must also record field conditions, problems encountered, local sources of contamination (e.g., operating generators or vehicles), the personnel involved, equipment and supplies used, waste generated, and field observations.

Storage and Disposal Method: Decontamination water will be containerized at the point of generation and initially managed as nonhazardous waste. Decontamination water from different sources (i.e., down hole equipment, rinsing a frac tank, drilling equipment/materials prior to use) must be segregated into different containers and analyzed separately. If the analytical data and due diligence documentation show that the decontamination water is a hazardous waste (i.e., contain constituents from a listed source), which is not anticipated, they will continue to be managed as non-hazardous/non-radioactive pending approval of a "contained in" from the NMED for the potentially listed constituents. WM-PROG must be notified on or before day 70 of the need for a "contained in" request so that approval may be obtained from NMED. If the decontamination water was derived from the decontamination of drilling equipment/materials prior to use at LANL and it is found to contain chemicals that are potentially K-listed only, a due diligence does not have to be prepared. In lieu of addressing the K-listed chemicals, the following statement must be included on the Waste Profile Form (WPF):

> "Most K-listed sources are industrial in nature and not typical of Laboratory operations. The Laboratory generates only small amounts of K-listed wastes, primarily spent carbon from high explosives processing that is disposed off-site. The documents amounts of K-listed wastes generated are not sufficient to have impacted well drilling and sampling operations. Therefore, the IDW is not K-listed."

If the decontamination water is characterized as LLW it will be managed in a radioactive waste staging or storage area it can be shipped for disposal. If the decontamination water is characterized as Hazardous or MLLW (with D-codes for characteristic waste) it will be managed in a less than 90-Day Storage Area (with a start date equal to the earliest date of generation by container) until it can be shipped for disposal. Decontamination water may be disposed of on-site at the SWWS or the RLWTF if the facility WAC requirements are met. If the non-hazardous waste fails to meet the RLWTF WAC only due to high COD, if approved by the WM-PROG Group, can be treated (e.g., addition of 30% hydrogen peroxide) to bring down the COD level to the RLWTF limit of 250 mg/L so that the waste can be disposed of at that facility. If the waste cannot be disposed of at either of these facilities, due to operational limitations or inability to meet the WAC, it will be sent to an authorized off-site facility for treatment, storage, and disposal.

Waste # 6 – Storm water: This waste stream is comprised of storm water for discharge and/or potentially contaminated storm water (i.e., tainted with petroleum or non-hazardous glycol based lubricants) collected within a secondary containment unit. It is estimated that approximately 500 gallons of storm water will be generated at each well location.

NOTE #1: Storm water collected in a secondary containment typically results in a waste stream that is comprised of both solids and liquids. The solids are addressed as Waste #7 and must be segregated (within reason) from storm water that cannot be discharged (is a waste) before it is containerized so that the Total Suspended Solids (TSSs) do not exceed the RLWTF WAC of 10,000 mg/L (*P930-1, Attachment 1;* 1.5).

Anticipated Regulatory Status: Reusable (released under ENV-CP policy), Used Oil for Recycle (Oily Water), LLW, MLLW, Hazardous, Industrial, SWWS, RLWTF

Characterization Approach: Storm water will be characterized based on the AK from the MSDS of the contaminant (e.g., hydraulic fluid) or by direct sampling. Samples, if needed, will be collected in accordance with LANL SOP-06.15, *COLIWASA Sampler for Liquids and Slurries* or subcontractor equivalent procedure. If the SOP is not used, the type of sampling equipment and methods used will be consistent with EPA 530-D-02-002. A representative sample will be taken within 10 days of generation (i.e., date of initial placement into container) so that a waste determination can be made within 45 days of generation and wastes dispositioned within 90 days, if necessary. All samples will be submitted with a 30-day turnaround time for analyses. Samples will be analyzed for TAL metals; VOCs; SVOCs; oil/grease; TSS; pH; PCB; cyanide; nitrates/nitrites; perchlorates; fluorine, chlorine, sulfate, COD, biological oxygen demand (BOD), TPH, and pesticides/herbicides.

Sampling personnel must record sampling information in accordance with EP-ERSS-SOP-5058 and EP-ERSS-SOP-5181. The Field notebook or sample collection sheet must be used to document sample collection activities (e.g., equipment and sampling methods used, number and location of samples, etc.). Sampling personnel must also record field conditions, problems encountered, local sources of contamination (e.g., operating generators or vehicles), the personnel involved, equipment and supplies used, waste generated, and field observations.

NOTE #2: The criteria for recycling oil, used oil, and coolant is as follows:

- Acceptable Oil, used Oil, and Coolant
  - Used and unused petroleum oils
  - Oil filters for non-prohibited oils
  - Non-hazardous glycol-based coolants (antifreeze)
  - Oily water
  - Used and unused synthetic oils
  - Non-hazardous used oil adsorbents
  - Mineral oil
- Unacceptable Oil, Used Oil, and Coolant
  - Oil with >1000 ppm halogens (oils mixed with solvents)
  - Freon-contaminated oil
  - Oils containing chlorinated compounds

- Degreasers containing chlorinated compounds
- Radiation-contamination oils
- Any oil containing >2ppm PCB
- Hazardous glycol-based coolants (fails TCLP for Se or Pb)
- Vegetable and other food oils

Storage and Disposal Method: Potentially contaminated storm water will be managed in accordance with the requirements in 20-6-2-1201, NMAC of the New Mexico Water Quality control Commission (NMWQCC) Regulations; 40 CF 112, Oil Pollution Prevention Regulations (SPPC Plan): 40 CFR122, Construction General Permit Regulations, and applicable SWPPP requirements. To determine if storm water discharges from secondary containment systems are permitted on LANL property under LANL's discharge policy, the following steps are mandatory:

1. Check for oil sheen. If oil sheen exists, contact Jake Meadows, at 606-0185, for handling requirements.
2. Check pH. The pH must be between 6 and 9.
3. Notify ENV-CP (Jake Meadows 606-0185) prior to proposed discharge.
4. If discharge is not granted by ENV-CP, the contaminated storm water must be containerized and managed as waste.

Contaminated storm water that cannot be discharged will be containerized at the point of generation and managed in accordance with the regulatory classification of the waste and disposed of at an authorized treatment, storage, disposal facility.

For unintentional release or discharges of potentially contaminated storm water to the environment, the following actions must be taken:

1. Document the volume of waste released; time, date, and location of the discharge; and other conditions on the Liquid Discharge Form (see Attachment 1).
2. Submit the Liquid Discharge Form to Jacob Meadow via FAX to 505-665-9344.
3. Document the discharge in the SPCC Plan or SWPP, when applicable.

Waste # 7 – Residual Solids from Secondary Containments: This waste stream is comprised of residual solids segregated during the containerization of storm water and decontamination fluids that have been removed from secondary containments. It may consist of residues, pebbles, soil, cuttings, and/or rocks that cannot be disposed of at the RLWTF because the Total Suspended Solids (TSSs) exceed the RLWTF WAC of 10,000 mg/L (*P930-1, Attachment 13;* 1.5). It is estimated that approximately 1 yd^3 of residual solids will be generated at each well location.

NOTE #4: Residual solids cannot be collected and added to the drill cuttings/fluids pit. They must be containerized, segregated, and managed as waste.

Anticipated Regulatory Status: LLW, MLLW, Hazardous, Industrial

Characterization Approach: Residual solids will be characterized based upon the AK of the media (i.e., cuttings, decontamination water, storm water) with which it came into contact and/or using the analytical results obtained from direct sampling. Samples, if needed, will be collected in accordance with LANL SOP-06-10, *Hand Auger and Thin-Wall Tube Sampler* and analyzed for TAL metals; radionuclides (by alpha and gamma spectroscopy); isotopic uranium, isotopic plutonium, americium-241, tritium, and strontium-90; volatile organic compounds (VOCs); semi-volatile organic compounds (SVOCs); PCB; cyanide; nitrates/nitrites; perchlorates; and pesticides/herbicides. Toxicity characteristic leaching procedure (TCLP) analysis may also be performed for TAL metals if the analytical results for the total metals divided by 20 indicate contaminants that exceed regulatory thresholds. Total petroleum hydrocarbons (TPH) will be analyzed if staining is observed. Other constituents may be analyzed as necessary to meet the WAC of the disposal facility.

Sampling personnel must record sampling information in accordance with EP-ERSS-SOP-5058 and EP-ERSS-SOP-5181. The Field notebook or sample collection sheet must be used to document sample collection activities (e.g., equipment and sampling methods used, number and location of samples, etc.). Sampling personnel must also record field conditions, problems encountered, local sources of contamination (e.g., operating generators or vehicles), the personnel involved, equipment and supplies used, waste generated, and field observations.

Storage and Disposal Method: Residual solids will be containerized at the point of generation and managed as non-hazardous/non-radiological pending review of AK and/or analytical results to determine final waste characterization. Residual solids from different sources (i.e., decontamination, storm water) must be segregated into different containers and analyzed separately. If the analytical data and due diligence documentation show that the residual solids are a hazardous waste (i.e., contain constituents from a listed source), they will continue to be managed as non-hazardous/non-radioactive pending approval of a "contained in" from the NMED for the potentially listed constituents. WM-PROG must be notified on or before day 70 of the need for a "contained in" request so that approval may be obtained from NMED.

If the residual solids are characterized as LLW they will be managed in a radioactive waste staging or storage area it can be shipped for disposal. If the residual solids are characterized as Hazardous or MLLW (with D-codes for characteristic waste) they will be managed in a less than 90-Day Storage Area (with a start date equal to the earliest date of generation by container) until they can be shipped for disposal. Residual solids will be shipped and disposed of at an authorized off-site facility.

Waste # 8 – Drilled Out Concrete, Chips, Concrete Slurry: This waste stream consists of concrete chips from drilling out a plug used to seal off perched groundwater or stabilized the borehole to facilitate drilling. It is estimated that 80 yd^3 of drilled out concrete chips or concrete slurry may be generated at each well.

Anticipated Regulatory Status: Reusable (released under ENV-CP policy), LLW, MLLW, Hazardous, Industrial

Characterization Approach: This waste stream will be characterized based upon the AK from the MSDS for the cement and/or the media (i.e., cuttings) with which it came into contact.

Storage and Disposal Method: Concrete waste will be containerized at the point of generation and managed as non-hazardous/non-radiological pending review of AK and/or analytical results (of associated media) to determine final waste characterization. If the concrete waste is not contaminated, it may be sent to the county landfill for reuse with an ENV-CP approval for release. Otherwise, the concrete must be managed in accordance with the regulatory classification of the waste. Waste concrete will be shipped and disposed of at an authorized off-site facility.

Waste # 9 – Residual Concrete Washout: This waste stream is comprised of residual cement generated from the evaporation of concrete wash out water. It is estimated that 4 yd^3 of residual concrete may be generated at each well location.

Anticipated Regulatory Status: Reusable (released under ENV-CP policy), Industrial

Characterization Approach: This waste stream will be characterized based upon the AK from the MSDS for the cement and/or the media (i.e., cuttings) with which it came into contact.

Storage and Disposal Method: Residual concrete washout waste will remain in an on-site containment until final waste characterization and disposition. If the residual concrete waste is not contaminated, it may be sent to the county landfill for reuse with an ENV-CP approval for release. Otherwise, the concrete must be containerized and managed in accordance with the regulatory classification of the waste. Waste concrete will be shipped and disposed of at an authorized off-site facility.

Waste # 10 – Petroleum Contaminated Soils (PCS): This waste stream is comprised of soils contaminated due to the accidental release of commercial products such as hydraulic fluid, motor oil, unleaded gasoline, or diesel fuel (e.g., from the rupture of hydraulic or fuel hoses, or spills during maintenance, etc.). It may also

include adsorbent padding, paper towels, spill pillows or other adsorbent material used to contain the released material and added to the containerized PCS waste for storage and disposal. It is estimated that 4 yd^3 of this waste stream will be generated at each well location.

Anticipated Regulatory Status: New Mexico Special Waste (NMSW), Hazardous, MLLW

Characterization Approach: PCS will be characterized based upon either AK or direct waste sampling. If the material spilled is known and the spill occurs on clean base course, AK can be used to characterize the waste as NMSW. If the spill is of an unknown material/origin or occurs in an AOC, PRS, or SWMU, characterization will be based upon the analytical results from direct sampling either performed in place (same day as spill/containerization) or from the containerized waste within 10 days of generation. If sampling is required, samples will be collected in one of the following two ways:

1. For spills containerized in large containers (i.e., 55-gallon drums) and/or deep spills being sampling in place the samples will be collected in accordance with LANL SOP-06-10, *Hand Auger and Thin-Wall Tube Sampler.*

2. For spills containerized in small containers and/or shallow spills being sampled in place the samples will be collected in accordance with SOP-06.11, *Spade and Scoop Method for Collection of Soil Samples.*

The analysis of the samples will be dependent on where the spill occurred as follows:

- If the spill occurred on clean soil (and samples are collected), samples will be analyzed for VOCs, TPH, gasoline-range and diesel-range (DRO/GRO), and total metals, at a minimum. These analytical suites are required to determine whether the waste is NMSW. Other constituents may be analyzed as necessary to meet the WAC of the disposal facility.

- If the spill occurs on soils with known hazardous contaminants or soils with no available/reliable AK documentation the samples will be analyzed, at minimum, for VOCs, SVOCs, TPH, gasoline-range and diesel-range (DRO/GRO) and total metals. Toxicity characteristic leaching procedure (TCLP) analysis may also be performed for TAL metals if the analytical results for the total metals divided by 20 indicate contaminants that exceed regulatory thresholds. If radiological contamination is a possibility the samples must also be analyzed for radionuclides (by alpha and gamma spectroscopy): isotopic uranium, isotopic plutonium, americium-241, tritium, and strontium-90.

All samples will be submitted with a 30 day turnaround time for analysis so that a waste determination can be made within 45 days of generation. The "initial" date or date of generation for NMSW is the date the container is completely full or the date in which no additional NMSW will be added to the container. The "final" date (or the date starting the 90 day NMSW clock) is the date that the validated analytical data is received by the WMC.

Sampling personnel must record sampling information in accordance with EP-ERSS-SOP-5058 and EP-ERSS-SOP-5181. The Field notebook or sample collection sheet must be used to document sample collection activities (e.g., equipment and sampling methods used, number and location of samples, etc.). Sampling personnel must also record field conditions, problems encountered, local sources of contamination (e.g., operating generators or vehicles), the personnel involved, equipment and supplies used, waste generated, and field observations.

Storage and Disposal Method: PCS will be containerized at the point of generation on the same day that the spill occurred. If AK for the site indicates that the soil will not be contaminated with radioactive or hazardous materials, the PCS will be managed as NMSW and the NMSW start date will be the date the container is completely full or the date in which no additional NMSW will be added to the container. If AK for the site indicates that the soil could be contaminated with radioactive or hazardous materials the PCS will be stored in a clearly marked and constructed waste accumulation area appropriate to the anticipated waste type. Waste accumulation area postings, regulated storage duration, and inspection requirements will be based upon the waste classification. The following provides the management and disposal pathways for PCS that has a final waste determination:

1. PCS that is not contaminated with radioactive or hazardous materials will be managed as NMSW if one or more of the following conditions are met:

    - If the sum of benzene, toluene, ethylbenzene, and xylene isomer concentrations are greater than 50 mg/kg.

- If benzene individually is equal to or greater than 10 mg/kg (Note: If benzene concentrations are equal to or greater than 0.5 mg/L, based upon TCLP, it is a hazardous waste, not a NMSW).
- If TPH (DRO + GRO) concentration is greater than 100 mg/kg.

PCS that is characterized as NMSW will remain in the registered NMSW area until it is shipped for disposal to an authorized off-site facility.

2. PCS that is not contaminated with radioactive or hazardous materials will be managed as industrial waste if the contaminant levels are less than the NMSW and/or PCB regulatory levels. PCS that is characterized as industrial waste will be removed from the registered NMSW area and stored as industrial waste until it is shipped for disposal to an authorized off-site facility.
3. PCS that is characterized as LLW will be moved to a radioactive waste staging or storage area it can be shipped for disposal to an authorized off-site facility.
4. PCS characterized as Hazardous or MLLW will be managed in a less than 90-Day Storage Area (with a start date equal to the earliest date of generation by container) until it can be shipped for disposal to an authorized off-site facility.

Waste # 11 – Municipal Solid Waste (MSW): This waste stream is comprised of non-contact trash, including, but not limited to, paper, cardboard, wood, plastic, food, and beverage containers. It is estimated that 8 yd^3 of MSW will be generated at each well location.

Anticipated Regulatory Status: MSW

Characterization Approach: MSW will be characterized based on AK of the waste materials (including MSDSs) and methods of generation.

Storage and Disposal Method: MSW will be segregated from all other waste streams. It is anticipated that the wastes will be stored in plastic trash bags or other appropriate containers and transferred/disposed of at the County of Los Alamos Solid Waste Transfer Station or other authorized off-site solid waste facility.

TABLE 1- CHARACTERIZATION TABLE

NOTE: Multiple sampling may be required to ensure WAC requirements are met.

Waste Description	Waste # 1 Contact Waste	Waste # 2 Drill Cuttings	Waste # 3 Drilling Fluids	Waste # 4 Development Water
Estimated Volume	25-yd^3/well (includes liner)	70-yd^3/well	5000-gal/well	5000-gal/well
Packaging	Drums/Roll Offs	Lined Pit/Drums/Roll Offs	Lined Pit/Drums/Tanks	Frac Tanks/Drums
Regulatory classification:				
Radioactive Waste	X	X	X	X
Reusable Material		X (Land Applied)	X (Land Applied)	X (Land Applied)
Municipal Solid Waste (MSW)	X			
Waste destined for LANL's SWWS or RLWTF [1]				X
Hazardous Waste	X	X	X	X
Mixed (hazardous and radioactive) Waste		X	X	X
Toxic Substances Control Act (TSCA)				
New Mexico Special Waste				
Industrial Waste	X	X	X	X
Characterization Method				
Acceptable knowledge (AK): Existing Data/Documentation	X			
AK: Site Characterization				
Direct Sampling of Waste		X	X	X
Analytical Testing				
Volatile Organic Compounds (EPA 8260-B)		X	X	X
Semivolatile Organic Compounds (EPA 8270-C)		X	X	X
Organic Pesticides (EPA 8081-A)		X	X	X
Organic Herbicides (EPA 8151-A)		X	X	X
PCBs (EPA 8082)		X	X	X
Total Metals (EPA 6010-B/7471-A)		X	X	X
Total Cyanide (EPA 9012-A) [2]		X	X	X
Nitrates/Nitrites (EPA 300.09)		X	X	X
Dioxins/Furans (EPA 1613B)				
Oil/Grease (EPA 1665)			X	X
Fluoride, Chlorine, Sulfate (EPA 300)			X	X
TTO (EPA 8260-B and EPA 8270-C) [3]				
Total Suspended & Dissolved Soilds (TSS) and Total Dissolved Soilds (TDS) (EPA 160.1 and 160.2)			X	X
Chemical Oxygen Demand (COD) (EPA 410.4)			X	X
pH (EPA 904c)			X	X
Microtox or Biological Oxygen Demand (BOD) [4]			X	X
Perchlorates (EPA 6850)		X	X	X
High Explosives Constituents (EPA 8330/8321-A)			X	X
Asbestos				
BTEX (EPA-8021b)				
Total petroleum hydrocarbon (TPH)-GRO (EPA 8015-M) TPH-DRO (EPA 8015-M)		X (As needed)		
Toxicity characteristic leaching procedure (TCLP) Metals (EPA 1311/6010-B)		X (As needed)	X (As needed)	
TCLP Organics (EPA 1311/8260-B & 1311/8270-C)		X (As needed)	X (As needed)	
TCLP Pest. & Herb. (EPA 1311/8081-A/1311/8151-A)		X (As needed)	X (As needed)	
Radium 226 & 228 (EPA 9320)		X	X	X
Gross Alpha (alpha counting) (EPA 900)		X	X	X
Gross Beta (beta counting) (EPA 900)		X	X	X
Tritium (liquid scintillation) (EPA 906.0)		X	X	X
Gamma spectroscopy (EPA 901.1)		X	X	X
Isotopic plutonium (Chem. Separation/alpha spec.) (HASL-300)		X	X	X
Isotopic uranium (Chem. Separation/alpha spec.) (HASL-300)		X	X	X
Total uranium (EPA 6020)		X	X	X
Strontium-90 (EPA 905)		X	X	X
Americium-241 (Chem. Separation/alpha spec.) (HASL-300)		X	X	X
Isotopic Thorium		X	X	X
Waste Profile Form #	TBD	TBD	TBD	TBD

TABLE 1- CHARACTERIZATION TABLE (CONTINUED)

Waste Description	Waste #5 Decontamination Fluids	Waste #6 Storm Water	Waste #7 Residual Solids from Secondary Containments	Waste #8 Drilled Out Concrete, Chips, Concrete Slurry
Estimated Volume	500-gal/well	500-gal/well	1-yd^3/well	80-yd^3/well
Packaging	Drums/Tanks	Drums/Tanks	Drums	Drums/Roll Offs
Regulatory classification				
Radioactive Waste	X	X	X	
Reusable Material		X (Released; Used Oil for Recycle)		X (with ENV-CP Approval)
Municipal Solid Waste (MSW)				
Waste destined for LANL's SWWS or RLWTF [1]	X	X		
Hazardous Waste	X	X	X	X
Mixed (hazardous and radioactive) Waste	X	X	X	X
Toxic Substances Control Act (TSCA)				
New Mexico Special Waste				
Industrial Waste	X	X	X	X
Characterization Method				
Acceptable knowledge (AK): Existing Data/Documentation	X	X	X	X
AK: Site Characterization				
Direct Sampling of Waste	X	X	X	
Analytical Testing				
Volatile Organic Compounds (EPA 8260-B)	X	X	X	
Semivolatile Organic Compounds (EPA 8270-C)	X	X	X	
Organic Pesticides (EPA 8081-A)	X	X	X	
Organic Herbicides (EPA 8151-A)	X	X	X	
PCBs (EPA 8082)	X	X	X	
Total Metals (EPA 6010-B/7471-A)	X	X	X	
Total Cyanide (EPA 9012-A) [2]	X	X	X	
Nitrates/Nitrites (EPA 300.09)	X	X	X	
Dioxins/Furans (EPA 1613B)				
Oil/Grease (EPA 1665)	X	X		
Fluoride, Chlorine, Sulfate (EPA 300)		X		
TTO (EPA 8260-B and EPA 8270-C) [3]				
Total Suspended & Dissolved Soilds (TSS) and Total Dissolved Soilds (TDS) (EPA 160.1 and 160.2)	X	X		
Chemical Oxygen Demand (COD) (EPA 410.4)	X	X		
pH (EPA 904c)	X	X		
Microtox or Biological Oxygen Demand (BOD) [4]	X			
Perchlorates (EPA 6850)	X	X	X	
High Explosives Constituents (EPA 8330/8321-A)	X	X		
Asbestos				
BTEX (EPA-8021b)				
Total petroleum hydrocarbon (TPH)-GRO (EPA 8015-M) TPH-DRO (EPA 8015-M)		X	X (As needed)	
Toxicity characteristic leaching procedure (TCLP) Metals (EPA 1311/6010-B)			X (As needed)	
TCLP Organics (EPA 1311/8260-B & 1311/8270-C)			X (As needed)	
TCLP Pest. & Herb. (EPA 1311/8081-A/1311/8151-A)			X (As needed)	
Radium 226 & 228 (EPA 9320)	X	X	X	
Gross Alpha (alpha counting) (EPA 900)	X	X	X	
Gross Beta (beta counting) (EPA 900)	X	X	X	
Tritium (liquid scintillation) (EPA 906.0)	X	X	X	
Gamma spectroscopy (EPA 901.1)	X	X	X	
Isotopic plutonium (Chem. Separation/alpha spec.) (HASL-300)	X	X	X	
Isotopic uranium (Chem. Separation/alpha spec.) (HASL-300)	X	X	X	
Total uranium (EPA 6020)	X	X	X	
Strontium-90 (EPA 905)	X	X	X	
Americium-241 (Chem. Separation/alpha spec.) (HASL-300)	X	X	X	
Isotopic Thorium	X	X	X	
Waste Profile Form #	TBD	TBD	TBD	TBD

TABLE 1- CHARACTERIZATION TABLE (CONTINUED)

Waste Description	Waste #9 Residual Concrete Washout	Waste #10 Petroleum Contaminated Soils (PCS)	Waste #11 Municipal Solid Waste (MSW)
Estimated Volume	4-yd^3/well	4-yd^3/well	8-yd^3/well
Packaging	Drums	Drums	Plastic Trash Bags/Trash Cans/Dumpsters
Regulatory classification:			
Radioactive Waste		X	
Reusable Material	X (with ENV-CP Approval)		
Municipal Solid Waste (MSW)			X
Waste destined for LANL's SWWS or RLWTF [1]			
Hazardous Waste			
Mixed (hazardous and radioactive) Waste			
Toxic Substances Control Act (TSCA)			
New Mexico Special Waste		X	
Industrial Waste		X	
Characterization Method			
Acceptable knowledge (AK): Existing Data/Documentation	X	X	X
AK: Site Characterization			
Direct Sampling of Waste		X	
Analytical Testing			
Volatile Organic Compounds (EPA 8260-B)		X (As needed)	
Semivolatile Organic Compounds (EPA 8270-C)		X (As needed)	
Organic Pesticides (EPA 8081-A)			
Organic Herbicides (EPA 8151-A)			
PCBs (EPA 8082)			
Total Metals (EPA 6010-B/7471-A)		X (As needed)	
Total Cyanide (EPA 9012-A) [2]			
Nitrates/Nitrites (EPA 300.09)			
Dioxins/Furans (EPA 1613B)			
Oil/Grease (EPA 1665)			
Fluoride, Chlorine, Sulfate (EPA 300)			
TTO (EPA 8260-B and EPA 8270-C) [3]			
Total Suspended & Dissolved Soilds (TSS) and Total Dissolved Soilds (TDS) (EPA 160.1 and 160.2)			
Chemical Oxygen Demand (COD) (EPA 410.4)			
pH (EPA 904c)			
Microtox or Biological Oxygen Demand (BOD) [4]			
Perchlorates (EPA 6850)			
High Explosives Constituents (EPA 8330/8321-A)			
Asbestos			
BTEX (EPA-8021b)			
Total petroleum hydrocarbon (TPH)-GRO (EPA 8015-M) TPH-DRO (EPA 8015-M)		X (As needed)	
Toxicity characteristic leaching procedure (TCLP) Metals (EPA 1311/6010-B)		X (As needed)	
TCLP Organics (EPA 1311/8260-B & 1311/8270-C)		X (As needed)	
TCLP Pest. & Herb. (EPA 1311/8081-A/1311/8151-A)			
Radium 226 & 228 (EPA 9320)		X (As needed)	
Gross Alpha (alpha counting) (EPA 900)		X (As needed)	
Gross Beta (beta counting) (EPA 900)		X (As needed)	
Tritium (liquid scintillation) (EPA 906.0)		X (As needed)	
Gamma spectroscopy (EPA 901.1)		X (As needed)	
Isotopic plutonium (Chem. Separation/alpha spec.) (HASL-300)		X (As needed)	
Isotopic uranium (Chem. Separation/alpha spec.) (HASL-300)		X (As needed)	
Total uranium (EPA 6020)		X (As needed)	
Strontium-90 (EPA 905)		X (As needed)	
Americium-241 (Chem. Separation/alpha spec.) (HASL-300)		X (As needed)	
Isotopic Thorium		X (As needed)	
Waste Profile Form #	TBD	TBD	TBD

1 In addition to other analytes needed to characterize the waste (e.g., VOC, SVOC, total metals), analyze for TSS, TDS, Oil and Grease, gross alpha gross beta, tritium, and pH for liquids destined for the LANL sanitary waste water system (SWWS). For wastes destined for the RLWTF

additional constituents include TTO, TSS, COD, pH, total nitrates/nitrites, and gross alpha, gross beta (not including tritium), and gross gamma or the sum of individual alpha-, beta-, and gamma-emitting nuclides.

2 Filtered metals and filtered Cyanide are required for land application, with the exception of mercury (hg).
3 TTO is the total of volatile organic and semi-volatile organic compound contaminants. Request methods EPA 8260-B (VOCs) and EPA 8270-C (SVOCs).
4 If Microtox analysis is not available, request BOD.
5 Based on direct sampling of associated sediment (Waste #1).
6 Only if other analyses indicate material constitutes a mixed waste.
7 Only if total concentrations of RCRA toxicity characteristic constituents exceed 20 times their regulatory limit.

Notes:

If data are insufficient to make a definitive regulatory classification at the time of WCSF completion, more than one box on the characterization table may be checked, along with an explanation in the text section. The final regulatory classification will be reflected on the waste profile form. The table identifies the suite of analyses required based on site knowledge, information needed by the anticipated receiving facility, or for land application, if applicable.

Section 1.2 of the TCLP method 1311 states "If a total analysis of the waste demonstrates that individual analytes are not present in the waste, or that they are present but at such low concentrations that the appropriate regulatory levels could not possibly be exceeded, the TCLP need not be run." The methodology for using total waste analyses determination for the 40 TC constituents in soil is as follows:

Liquids – Wastes containing less than 0.5% filterable solids do not require extraction and therefore by filtering the waste and measuring the total constituent level of the filtrate and comparing those levels to regulatory levels is appropriate.

Solids – Constituent concentrations from the extraction fluid of wastes that are 100% physical solids are divided by 20 (reflecting the 20 to 1 ratio of TCLP extraction) and then compared to the regulatory levels. If the theoretical levels do not equal or exceed the regulatory levels, the TCLP need not be run. If the levels do equal or exceed the regulatory levels, the generator may either declare the waste hazardous or run TCLP analyses.

Additional Analytical Information:

Standard analytical turnaround time is anticipated to be 30 calendar days. In the event a waste is suspected to be hazardous, the total waste volume exceeds 55 gallons (e.g., purge water, decontamination fluids, and contact waste), and a <90-day Accumulation Area is required, then an expedited analytical turnaround time will be needed to meet the 90-day time limit. Environmental Stewardship sample support will be notified if an expedited analysis is necessary. Utah-certified analytical laboratory data is recommended to meet the MLLW WAC for waste streams that are suspected to be hazardous and low-level radioactive.

References:

- 40 CFR 261.24, 40 *Code of Federal Regulations* Part 261, Identification and Listing of Hazardous Waste, Subpart C, Section 24, Toxicity Characteristic.
- ADEP-SOP-10021, *Characterization and Management of Environmental Program Waste*
- P-409, *Waste Management*
- P930-1, LANL Waste Acceptance Criteria
- P930-2, LANL Radioactive Waste Certification Program
- LA-UR-12-26098, *Drilling Work Plan for Regional Aquifer Well R-47 (EP2012-0254)*
- LA-UR-12-26784, *Drilling Work Plan for Regional Aquifer Well R-58 (EP2012-0271)*
- LA-UR-13-20150, *Drilling Work Plan for Regional Aquifer Well R-63i (EP2013-0015)*
- LA-UR-13-20779, *Drilling Work Plan for Well CdV-9-1(i) (EP2013-0007)*

Waste Characterization Strategy Form

Signatures	Date
Project Manager: Steve Paris	7/16/13
Waste Generator: Bennie Martinez	7/16/13
Waste Management Coordinator: Victor Garde	7/16/13
WM-PROG Representative: Jocelyn Buckley	7/16/13
Waste Acceptance Representative: Andy Elicio	07/16/2013
Waste Certification Program Representative: Michelle Coriz for Michelle Coriz	
	Los Alamos National Laboratory EP

ATTACHMENT 1

MAP OF WELL LOCATIONS

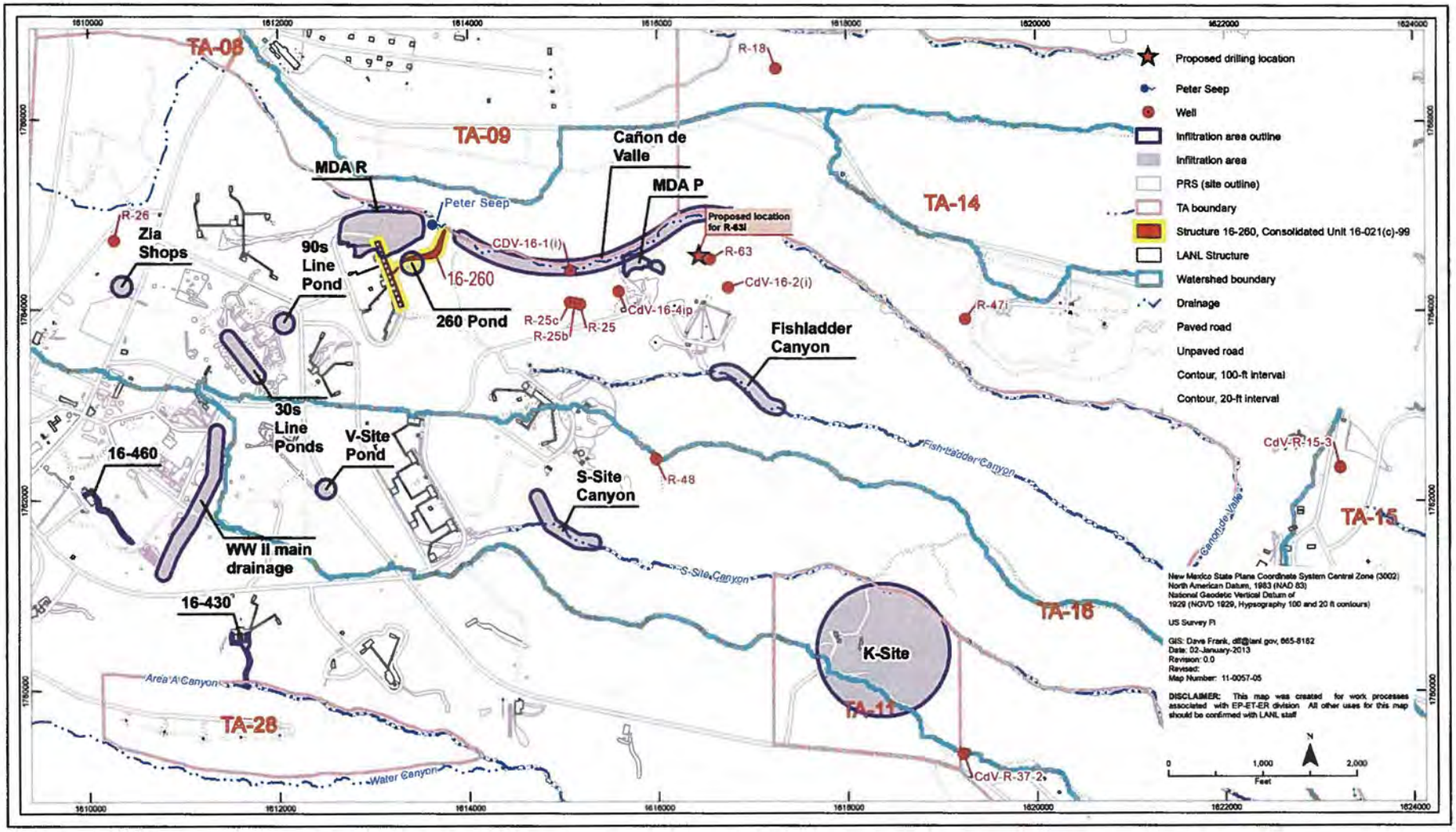

Figure 1 **Proposed location of well R-63i**

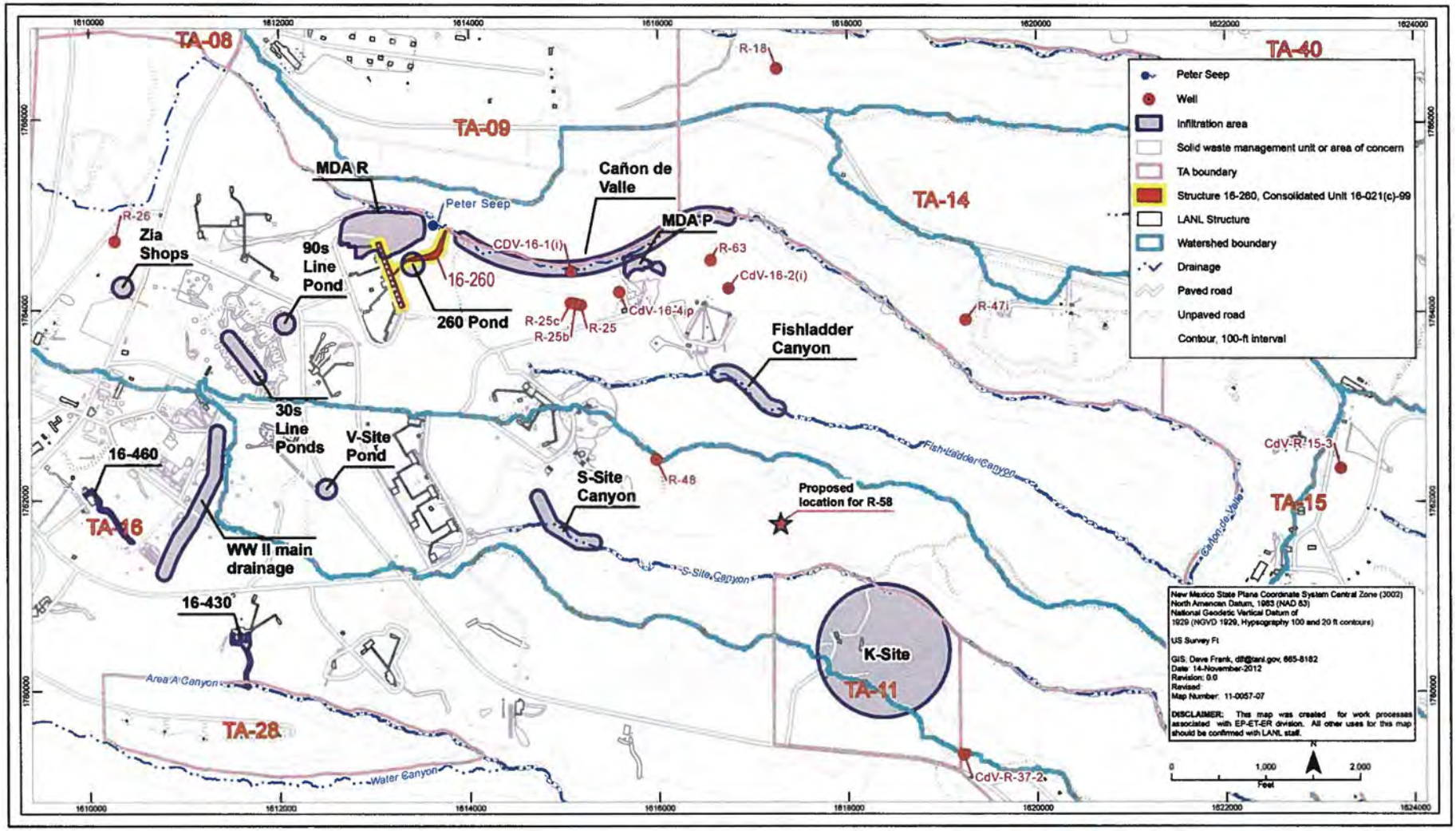

Figure 1 **Proposed location of well R-58**

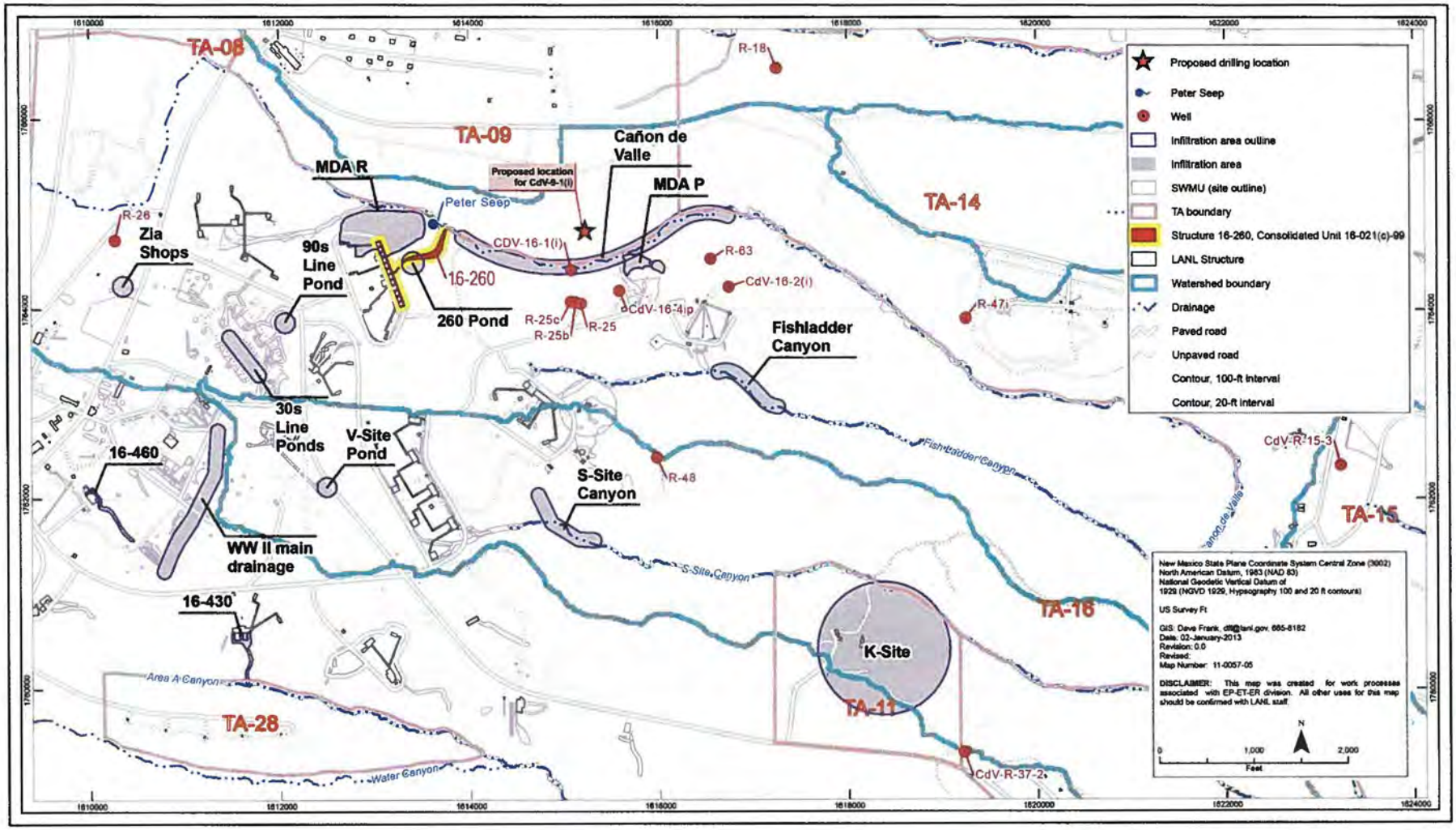

Figure 1 **Proposed location of well CdV-9-1(i)**

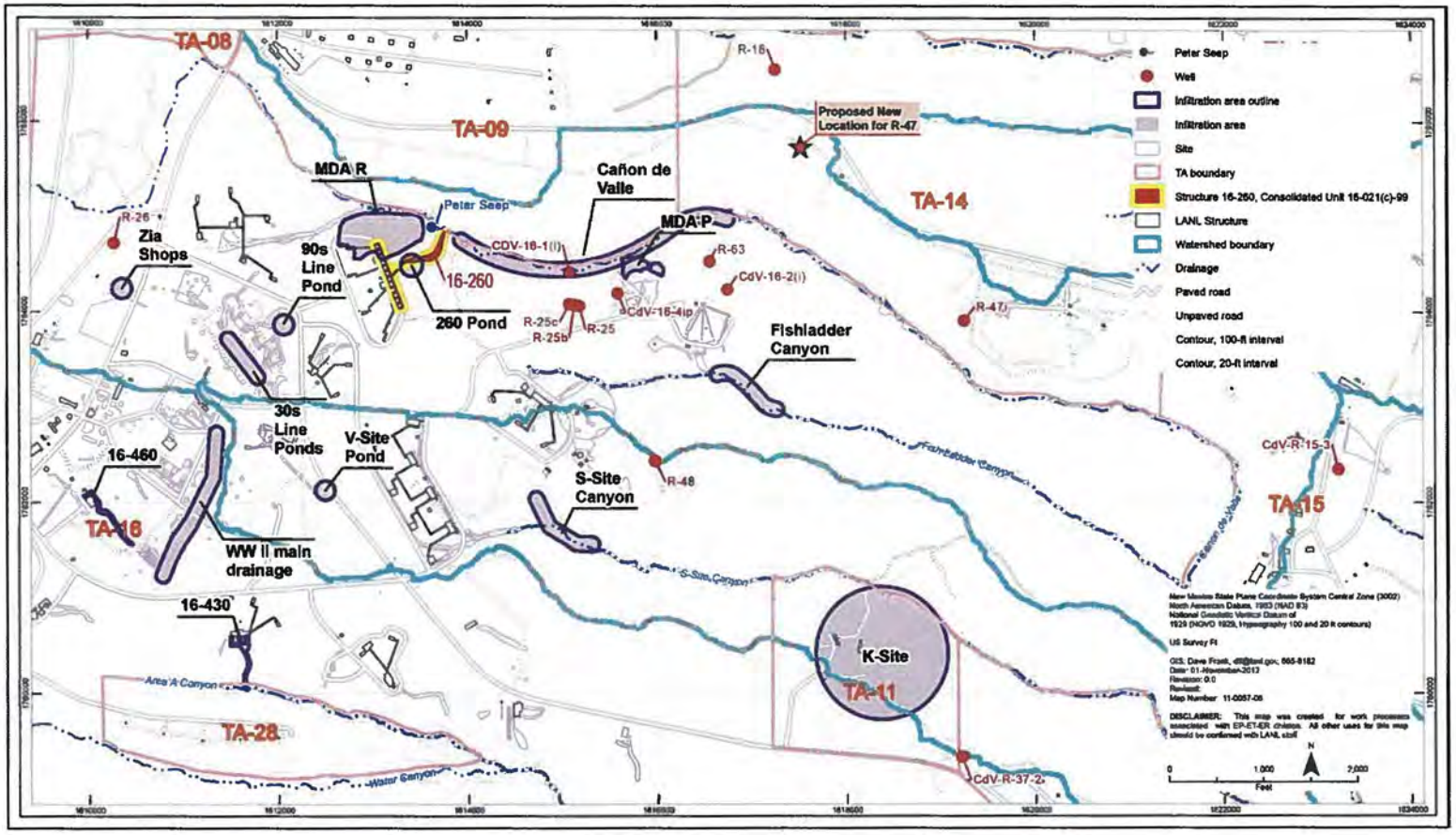

Figure 1 **Proposed location of well R-47**

ATTACHMENTS 2 and 3

CONTAINED-IN LETTERS

ATTACHMENT 2

Los Alamos
NATIONAL LABORATORY
EST. 1943
Environmental Programs
Corrective Actions Project
PO Box 1663, Mail Stop M992
Los Alamos, New Mexico 87545
(505) 667-0819/FAX (505) 665-4747

National Nuclear Security Administration
Los Alamos Site Office, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544
(505) 667-7203/FAX (505) 665-4504

Date: August 3, 2006
Refer to: EP2006-0700

Mr. James Bearzi
NMED–Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

SUBJECT: REQUEST FOR "CONTAINED IN" DETERMINATION FOR THE PURGED ALLUVIAL GROUNDWATER COLLECTED DURING THE QUARTERLY SAMPLING OF MONITORING WELLS ASSOCIATED WITH CONSOLIDATED UNIT 16-021(c)-99 INVESTIGATION WITHIN TECHNICAL AREA 16

Dear Mr. Bearzi:

The purpose of this letter is to request that the New Mexico Environment Department (NMED) Hazardous Waste Bureau use its discretionary authority to determine that the purged alluvial groundwater collected during quarterly sampling of monitoring wells as part of the Los Alamos National Laboratory's (LANL's) corrective measures study (CMS) investigation of Consolidated Unit 16-021(c)-99 and of the 16-340 Complex does not warrant management as F-listed hazardous waste, pursuant to the requirements of the New Mexico Administrative Code (NMAC), Title 20, Chapter 4, Part 1 (20.4.1.200 NMAC), §261.31.

Activities in the vicinity of Consolidated Unit 16-021(c)-99 and the 16-340 Complex include the quarterly sampling of 11 shallow alluvial wells: 5 located in Cañon de Valle, 3 in Fishladder Canyon, and 3 in Martin Spring Canyon. The maximum amount of purge water produced during each quarterly sampling event is approximately 4 gallons per well. Water containing potentially F-listed hazardous waste from historical spent solvent sources is currently stored in satellite accumulation areas (SAA) located at each well.

LANL compared detected concentrations of organic compounds in groundwater samples collected from the Technical Area (TA) 16 alluvial monitoring wells with applicable human health groundwater standards to determine if there are health-based concerns. These organic compound analytical results are provided in Attachment 1. The water quality standards are (1) human health standards for groundwater listed in 20.6.2.3103 NMAC, issued by the New Mexico Water Quality Control Commission (WQCC); and (2) the U.S. Environmental Protection Agency (EPA) National Primary Drinking Water Standards maximum contaminant levels (MCLs) (40 CFR 141.61). These water quality standards are provided in Table 1 (columns 8 and 9 respectively) along with the detected concentrations of five potentially F-listed organic compounds (toluene, tetrachloroethene, acetone,

methylene chloride, and trichloroethene) from groundwater samples. The groundwater sample results provided in the table are from the purge water currently stored in the SAA at TA-16. (The samples were collected from the same volume of water that was drawn from the wells; the purge water is now stored as waste.)

Table 1: Detected Concentrations of Potential F-Listed Organic Compounds from Groundwater Samples Collected from Alluvial Monitoring Wells at TA-16[a]

Location Name	Location Synonym	Sample Id	Start Date	Analyte	Result (µg/L)	Lab Qual Code[b]	Human Health (µg/L)[c]	EPA MCLs (µg/L)[d]	LDR Treatment Standard (µg/L)[e]
Canon de Valle Monitoring Wells									
CDV-16-02655	16-02655	GU0510CDV5501	11/17/2005	Toluene	0.459	J	750	1000	80
CDV-16-02655	16-02655	GU0510CDV5501	11/17/2005	Tetrachloroethene	0.489	J	na	5	56
CDV-16-02656	16-02656	GU0602CDV5601-FTB	3/31/2006	Acetone[f]	3.720	J	na	na	280
CDV-16-02656	16-02656	GU0602CDV5601	3/31/2006	Toluene	0.412	J	750	1000	80
CDV-16-02656	16-02656	GU0602CDV5690-FD	3/31/2006	Toluene	0.489	J	750	1000	80
CDV-16-02659	16-02659	GU0510CDV5901	11/17/2005	Toluene	0.298	J	750	1000	80
CDV-16-02659	16-02659	GU0602CDV5901	4/3/2006	Acetone[f]	4.940	J	na	na	280
CDV-16-02659	16-02659	GU0602CDV5901	4/3/2006	Toluene	0.454	J	750	1000	80
Martin Spring Canyon Monitoring Wells									
MSC-16-06294	16-06294	GU0507MSC9401	8/30/2005	Toluene	0.420	J	750	1000	80
MSC-16-06294	16-06294	GU0507MSC9401	8/30/2005	Methylene Chloride	3.700	BJ	100	5	89
MSC-16-06295	16-06295	GU0507MSC9501	8/30/2005	Toluene	0.480	J	750	1000	80
MSC-16-06295	16-06295	GU0507MSC9501	8/30/2005	Methylene Chloride	3.900	BJ	100	5	89
MSC-16-06295	16-06295	GU0507MSC9501-FTB	8/30/2005	Methylene Chloride	5.400		100	5	89
MSC-16-06295	16-06295	GU0602MSC9501	3/30/2006	Acetone[f]	5.94		na	na	280
MSC-16-06295	16-06295	GU0602MSC9501	3/30/2006	Toluene	0.492	J	750	1000	80
MSC-16-06295	16-06295	GU0602MSC9501-FTB	3/30/2006	Acetone[f]	3.060	J	na	na	280
Fish Ladder Canyon Monitoring Wells									
FLC-16-1	16-25280	GU06020FLC101	2/16/2006	Trichloroethene	3.990		na	5	54
FLC-16-1	16-25280	GU06020FLC101	2/16/2006	Toluene	0.462	J	750	1000	80
FLC-16-2	16-25279	RE16-06-64300	11/17/2005	Toluene	1.510		750	1000	80
FLC-16-3	16-25278	RE16-06-64302	11/17/2005	Toluene	0.451	J	750	1000	80

[a]The results presented in Table 1 represent data from purge water that is currently stored in SAAs at TA-16.
[b]J = an estimated value. The "J" flag is used if the compound is present but the result is less that the sample estimated quantitation limit and greater then the instrument detection limit. B = then analyte was found in the associated method blank as well as the sample.

[c]Human Health Standards as listed in Title 20 (Environmental Protection), Chapter 6 (Water Quality), Part 2 (Ground and Surface Water Protection [NMAC 20.6.2.3103] issued by the NM WQCC.

[d]EPA National Primary Drinking Water Standards Maximum Contaminant Levels (MCLs) [40 CFR 141.61].

[e]Land Disposal Restrictions (LDR) Treatment Standards for Hazardous Waste, Wastewaters (40 CFR 268.40).

[f]There is no Human Health Standard or EPA MCL for Acetone. The EPA Region 6 Tap Water Standard is 5500 µg/L [EPA, updated December 2005].

Note: FTB = Field Trip Blank; FD = Field Duplicate

The detected concentrations of three of the five potential F-listed organic compounds (toluene, tetrachloroethene, and trichloroethene) are below all the applicable standards. Toluene is present at very low concentrations in all of the monitoring wells and detections range between 0.298 µg/L and 1.51 µg/L. The detected concentrations of toluene are approximately 1000 times below the WQCC human health standards and EPA MCLs. Tetrachloroethene was detected in one sample in the Cañon de Valle monitoring well at a very low concentration of 0.489 µg/L, approximately 10 times below the EPA MCL.

Trichloroethene was detected in one sample in the Fish Ladder Canyon monitoring well at a concentration of 3.99 µg/L, just below the EPA MCL. There is no New Mexico WQCC human health standard or an EPA MCL for acetone. The EPA Region 6 risk-based human health screening tap water standard for acetone is 5500 µg/L (EPA, dated December 2005). All detected concentrations of acetone are approximately 1000 times below this standard. Methylene chloride is well below the WQCC human health standard for the groundwater samples; however, it slightly exceeds the EPA MCL in one sample—the field trip blank (FTB). The presence of acetone and methylene chloride in the samples, including the FTBs, is probably the result of contamination from analytical laboratory processes.

According to EPA documents and associated guidance, the authorized state may also make a determination on a case-specific basis as to how the Land Disposal Restrictions (LDRs) apply to the waste when a "contained in" determination has been made. Because the maximum detected concentrations of the five listed hazardous waste constituents are below their respective LDR wastewater treatment standard, as provided in Table 1; column 10, LANL also requests a determination from NMED that LDRs will not apply to this environmental media, and that it may be treated and disposed as a nonhazardous wastewater.

The very low concentrations of potential F-listed organic compounds in the groundwater data suggest that purge water from TA-16 alluvial monitoring wells does not require hazardous waste management as described in the Resource Conservation and Recovery Act (RCRA) "contained-in" policy. The RCRA contained-in policy (EPA530-F-98-026) states that environmental media is considered to no longer "contain" hazardous waste: (1) when it no longer exhibits a characteristic of hazardous waste and (2) when concentrations of hazardous constituents from listed hazardous waste are below health-based levels. The results presented in Table 1 indicate that the F-listed organic compounds detected in TA-16 alluvial monitoring wells and subsequently the purge water stored in the TA-16 SAA are below health-based standards. These analytical data satisfy the requirements necessary to support a " contained in" determination by NMED.

LANL requests that NMED include these organic compounds in the " contained in" determination and allow the purge water currently stored at TA-16 to be disposed of at the high explosives wastewater treatment plant (HEWWTP) located on-site. The HEWWTP is equipped with granular activated carbon filters that remove low concentrations of organic chemicals from purge water.

If during future sampling events the data indicate that the potential F-listed organic compounds identified in this letter are detected in TA-16 purge water at concentrations above the appropriate screening standards identified in Table 1, the media will be managed as hazardous waste. Additionally, if more potential listed hazardous waste constituents (i.e., other than those identified in Table 1) are detected in samples from future quarterly sampling events, an addendum to this " contained in" request will be submitted to NMED for approval.

LANL believes that a "contained in" determination for the organic constituents shown in Table 1 is appropriate. Disposal of purge water with very low concentrations of these organic compounds at the TA-16 HEWWTP is sufficient to protect human health and the environment. Additionally, it would allow for cost-effective treatment and management of the purge water generated from quarterly sampling of monitoring wells within Cañon de Valle, Fishladder Canyon, and Martin Spring Canyon in TA-16.

If you have any questions, please contact John McCann at (505) 665-1091 or Lance Woodworth at (505) 665-5820.

Sincerely,

Andrew Phelps, Associate Director
Environmental Programs
Los Alamos National Security, LLC

Sincerely,

David Gregory, Federal Project Director
Department of Energy
Los Alamos Site Office

AP/DG/JM/jr

Cy:

A. Dorries, EP-ERSS, MS M992
G. Dover, EP-CA, MS M992
D. McInroy, EP-CA, MS M992
C. Mangeng, ADEP, MS J591
A. Phelps, ADEP, MS J591
D. Gregory, DOE-LASO, MS A316
J. Keiling, NMED-HWB
J. Young, NMED-HWB
C. Voorhees, NMED-OB
P. Reneau, EP-RCRA, MS M992
L. King, EPA Region 6
S. Yanicak, NMED-OB
D. Hickmott, EES-HGG, MS D462
J. McCann, EP-CAP, MS M992
K. VanDerpoel, EP-RCRA, MS K490
CAP, MS M992
RPF, MS M707
IRM-RMMSO, MS A150

Attachment 1
Detected Concentrations of Organic Compounds from Groundwater Samples Collected from Alluvial Monitoring Wells at TA-16[a]

Location Name	Location Synonym	Sample Id	Start Date	Analyte	Result (µg/L)	Lab Qual Code[b]
Canon de Valle Monitoring Wells						
CDV-16-02655	16-02655	GU0510CDV5501	11/17/2005	Toluene	0.46	J
CDV-16-02655	16-02655	GU0510CDV5501	11/17/2005	Tetrachloroethene	0.49	J
CDV-16-02656	16-02656	GU0602CDV5690-FD	3/31/2006	RDX	0.32	J
CDV-16-02656	16-02656	GU0602CDV5601	3/31/2006	RDX	0.31	J
CDV-16-02656	16-02656	GU0602CDV5601	3/31/2006	HMX	0.48	
CDV-16-02656	16-02656	GU0602CDV5690-FD	3/31/2006	HMX	0.45	
CDV-16-02656	16-02656	GU0602CDV5601-FTB	3/31/2006	Acetone	3.72	J
CDV-16-02656	16-02656	GU0602CDV5601	3/31/2006	Toluene	0.41	J
CDV-16-02656	16-02656	GU0602CDV5601	3/31/2006	Acetone	5.70	
CDV-16-02656	16-02656	GU0602CDV5690-FD	3/31/2006	Toluene	0.49	J
CDV-16-02656	16-02656	GU0602CDV5690-FD	3/31/2006	Acetone	7.83	
CDV-16-02659	16-02659	GU0510CDV5901	11/17/2005	Amino-4,6-dinitrotoluene[2-]	2.55	
CDV-16-02659	16-02659	GU0510CDV5901	11/17/2005	RDX	15.80	
CDV-16-02659	16-02659	GU0510CDV5901	11/17/2005	Amino-2,6-dinitrotoluene[4-]	2.16	
CDV-16-02659	16-02659	GU0510CDV5901	11/17/2005	HMX	22.60	
CDV-16-02659	16-02659	GU0510CDV5901	11/17/2005	Toluene	0.30	J
CDV-16-02659	16-02659	GU0602CDV5901	4/3/2006	Amino-2,6-dinitrotoluene[4-]	2.57	
CDV-16-02659	16-02659	GU0602CDV5901	4/3/2006	Amino-4,6-dinitrotoluene[2-]	2.41	
CDV-16-02659	16-02659	GU0602CDV5901	4/3/2006	HMX	11.30	
CDV-16-02659	16-02659	GU0602CDV5901	4/3/2006	RDX	9.29	
CDV-16-02659	16-02659	GU0602CDV5901	4/3/2006	Acetone	4.94	J
CDV-16-02659	16-02659	GU0602CDV5901	4/3/2006	Toluene	0.45	J
Martin Spring Canyon Monitoring Wells						
MSC-16-06294	16-06294	GU0510MSC9401	11/15/2005	HMX	0.13	J
MSC-16-06294	16-06294	GU0507MSC9401	8/30/2005	Toluene	0.42	J
MSC-16-06294	16-06294	GU0507MSC9401	8/30/2005	Methylene Chloride	3.70	BJ
MSC-16-06295	16-06295	GU0507MSC9501	8/30/2005	HMX	2.65	
MSC-16-06295	16-06295	GU0507MSC9501	8/30/2005	Toluene	0.48	J
MSC-16-06295	16-06295	GU0507MSC9501	8/30/2005	Methylene Chloride	3.90	BJ
MSC-16-06295	16-06295	GU0507MSC9501-FTB	8/30/2005	Methylene Chloride	5.40	
MSC-16-06295	16-06295	GU0510MSC9501	11/15/2005	HMX	0.78	
MSC-16-06295	16-06295	GU0510MSC9501	11/15/2005	RDX	0.22	J
MSC-16-06295	16-06295	GU0602MSC9501	3/30/2006	HMX	0.24	J
MSC-16-06295	16-06295	GU0602MSC9501	3/30/2006	Acetone	5.94	
MSC-16-06295	16-06295	GU0602MSC9501	3/30/2006	Toluene	0.49	J
MSC-16-06295	16-06295	GU0602MSC9501-FTB	3/30/2006	Acetone	3.06	J
Fish Ladder Canyon Monitoring Wells						
FLC-16-1	16-25280	GU06020FLC101	2/16/2006	Trichloroethene	3.99	
FLC-16-1	16-25280	GU06020FLC101	2/16/2006	Toluene	0.46	J
FLC-16-1	16-25280	GU06020FLC101	2/16/2006	Dichloroethene[cis-1,2-]	26.70	
FLC-16-1	16-25280	GU06020FLC101	2/16/2006	Tetrachloroethene	6.09	
FLC-16-1	16-25280	GU06020FLC101-FTB	2/16/2006	Carbon Disulfide	3.17	J
FLC-16-2	16-25279	RE16-06-64302	11/17/2005	Toluene	1.51	
FLC-16-2	16-25279	RE16-06-64302	11/17/2005	HMX	7.00	
FLC-16-3	16-25278	RE16-06-64300	11/17/2005	Toluene	0.45	J
FLC-16-3	16-25278	RE16-06-64300	11/17/2005	HMX	4.03	

[a]The results presented in Attachment 1 represent data from purge water that is currently stored in SAAs at TA-16.

[b]Laboratory Qualifier Codes are presented in Table 1.
Note: FTB = Field Trip Blank; FD = Field Duplicate

ATTACHMENT 3

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us

BILL RICHARDSON
GOVERNOR

RON CURRY
SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 22, 2006

David Gregory
Federal Project Director
Los Alamos Site Office
Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, NM 87544

David McInroy
Remediation Services Deputy Program Director
Los Alamos National Laboratory
P.O. Box 1663, Mail Stop M992
Los Alamos, NM 87545

RE: CONTAINED-IN DETERMINATION FOR THE PURGED ALLUVIAL GROUNDWATER COLLECTED DURING THE QUARTERLY SAMPLING OF MONITORING WELLS ASSOCIATED WITH CONSOLIDATED UNIT 16-021(c)-99 INVESTIGATION WITHIN TECHNICAL AREA 16 LOS ALAMOS NATIONAL LABORATORY, EPA ID #NM0890010515 HWB-LANL-03-021

Dear Messrs. Gregory and McInroy:

The New Mexico Environment Department (NMED) has reviewed the Department of Energy and the Los Alamos National Security's, LLC (collectively, the Permittees) request for a contained-in determination for purged alluvial groundwater containing F-listed hazardous waste. The purged water was generated during the quarterly sampling of alluvial monitoring wells in Cañon de Valle, Martin Spring Canyon, and Fishladder Canyon and is associated with consolidated unit 16-021(c) and building 16-340. As part of the request, the Permittees provided a comparison of the detected F-listed constituents in each sample with the New Mexico Water Quality Control Commission (WQCC) standards, the Environmental Protection Agency (EPA) Maximum Contaminant Levels (MCLs), and the EPA Region 6 human health tap water screening level. The F-listed constituents that were detected are toluene, tetrachloroethene, acetone, methylene chloride, and trichloroethene. All of the detections for these constituents are

below the WQCC standards, MCLs, and human health tap water screening level (acetone only). The waste does not exhibit a characteristic, as defined in 40 C.F.R. Subpart C. Based on this information, NMED believes that the purge water does not need to be managed as F-listed waste.

The Permittees also request a determination that land disposal restrictions (LDR) do not apply to the purged water and that it may be managed and disposed as a nonhazardous wastewater. The Permittees provided a comparison of the F-listed constituents detected in the purged water with the LDR treatment standards. All of the detections are below the LDR treatment standards. Therefore, based on the low levels of toluene, tetrachloroethene, acetone, methylene chloride, and trichloroethene, LDRs do not apply to the purged water and it may be managed and disposed as nonhazardous waste water.

If additional F-listed constituents are detected during future sampling activities or if the constituents discussed above are detected at concentrations above cleanup standards or LDRs, the Permittees must request another contained-in determination or manage the purged water as a hazardous waste.

If you have any questions regarding this letter, please contact Darlene Goering of my staff at (505) 428-2542.

Sincerely,

James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:dxg

cc: D. Goering, NMED HWB
S. Yanicak, NMED DOE OB, MS J993
L. King, EPA 6PD-N
J. Ordaz, DOE LASO, MS A316
K. Hargis, LANL RRES/DO, MS M591
N. Quintana, LANL RRES-RS, MS M992
file: Reading and LANL TA-16 '06 (SWMUs 16-003(o) and 16-021(c))