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2000
RECEIVED

Date: July 7, 2000
Refer to: ER2000-0327

Mr. John Kieling
NMED-HRMB
P.O. Box 26110
Santa Fe, NM 87502

SUBJECT: REQUEST FOR "NO LONGER CONTAINED IN" DETERMINATION FOR POTENTIAL RELEASE SITE (PRS) 00-001, MORTANDAD SEDIMENT TRAPS

Dear Mr. Kieling:

The purpose of this letter is to request that the New Mexico Environment Department Hazardous and Radioactive Materials Bureau use their discretionary authority to determine that environmental media generated during routine maintenance at PRS 00-001, the Mortandad Sediment Traps, do not warrant management as F-listed hazardous waste. PRS 00-001 is listed on Table A of Module VIII of Los Alamos National Laboratory's (LANL's) Hazardous Waste Facility Permit.

The routine maintenance activities at PRS 00-001 involve excavating the environmental media that has accumulated in the sediment traps in an effort to reduce potential contaminant migration resulting from projected future flooding in Mortandad Canyon. Some of this excavated material may contain low levels of toluene, acetone, tetrachloroethene, benzene, methyl ethyl ketone, methylene chloride, xylenes, and/or 1, 2-dichloroethene (cis) that are known or believed to have originated from processes for which listed wastes are identified.

LANL proposes to use the Environment Protection Agency Region 6 Human Health Medium-Specific Screening Levels (MSSLs) for comparison to as-found concentrations to determine whether any of the organic constituents detected in excavated environmental media from PRS 00-001 warrant management as F-listed hazardous waste. The proposed MSSLs are based on the industrial receptor using direct exposure routes (inhalation, ingestion, and dermal contact) and are derived using conservative exposure parameters for reasonable maximum exposure. These MSSLs, based on an industrial receptor, are appropriate because the environmental media excavated during these removal activities will be properly disposed in an onsite engineered low-level radioactive waste disposal facility.

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The organic constituents, maximum concentration detected to date, and the proposed MSSLs are shown in the table below:

Organic Constituent	Maximum Concentration (mg/kg)	MSSL (mg/kg)
toluene	0.027	520
acetone	0.038	5800
tetrachloroethene	0.008	13
benzene	0.001	1.4
Methyl ethyl ketone	0.014	26000
methylene chloride	0.003	19
o-xylene	0.002	280
m-xylene	0.005	210
1,2-dichloroethene (cis)	0.003	150

If the as-found concentrations of the organic constituents listed above in the excavated environmental media are equal to or exceed the MSSLs, the material will be managed as F-listed hazardous waste. If the as-found concentrations in the excavated environmental media are below the MSSLs, the material will be managed as low-level radioactive waste unless and until it meets another listing criteria or exhibits a hazardous characteristic. Notably, any environmental media containing acetone, benzene, or (m- or o-) xylene would not qualify as F-listed hazardous waste since it would not exhibit the characteristic of ignitability, the basis for the listing.

LANL believes that a "no longer contained in" determination for the organic constituents listed above would allow for cost-effective removal of the environmental media at PRS 00-001, the Mortandad Sediment Traps, and, therefore prevent potential contaminant migration resulting from projected future flooding in Mortandad Canyon. If you have any questions, please contact Dave McInroy at (505) 667-0819 or Joe Mose at (505) 667-5808.

Sincerely,

for

Julie A. Canepa, Program Manager
Los Alamos National Laboratory
Environmental Restoration

Sincerely,

for Joseph H. Mose

Theodore J. Taylor, Program Manager
Department of Energy
Los Alamos Area Office

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