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State of New Mexico  
**ENVIRONMENT DEPARTMENT**

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**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

July 20, 2000

Dr. John Browne, Director  
Los Alamos National Laboratory  
P.O. Box 1663, Mail Stop A100  
Los Alamos, New Mexico 87545

Mr. Theodore Taylor, Project Manager  
Los Alamos Area Office  
Department of Energy  
528 35<sup>th</sup> Street, Mail Stop A316  
Los Alamos, New Mexico 87544

**RE: "Contained-In" Determination for Potential Release Site (PRS) 00-001, Mortandad Canyon Sediment Traps**

Dear Dr. Browne and Mr. Taylor:

The Hazardous Waste Bureau of the New Mexico Environment Department has reviewed Los Alamos National Laboratory's (LANL's) request for a "contained-in" determination for environmental media generated during routine maintenance at the Mortandad Canyon Sediment Traps (identified as PRS 00-001). The request is dated July 7, 2000 and referenced by ER2000-327. The "contained-in" determination is being requested for environmental media contaminated with low concentrations of F-listed hazardous waste, including toluene, acetone, tetrachloroethene, and methyl ethyl ketone. The environmental media consist primarily of soil and sediment that will be excavated during the maintenance activities. The Department evaluated the analytical and risk assessment data in accordance with current "contained-in" guidance to determine whether the environmental media to be excavated must be managed as F-listed hazardous waste.

The "contained-in" determination is based on conservative, health-based soil concentrations (i.e., US EPA Region 6 Human Health Medium-Specific Screening Levels) for direct exposure to an industrial receptor using a reasonable maximum exposure scenario. An industrial worker scenario is appropriate for this determination because the environmental media to be excavated will be properly disposed of in an engineered low-level radioactive waste disposal facility, further reducing the risk to human health and the environment. Based on the information provided, the Department believes that the media to be excavated during the maintenance



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Dr. Browne and Mr. Taylor

July 20, 2000

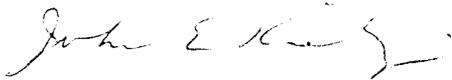
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activities which contain constituents at concentrations below the health-based screening levels do not need to be managed as F-listed hazardous waste: toluene below 520 parts per million (ppm), acetone below 5,800 ppm, tetrachloroethene below 13 ppm, benzene below 1.4 ppm, methyl ethyl ketone below 26,000 ppm, methylene chloride below 19 ppm, o-xylene below 280 ppm, m-xylene below 210 ppm and 1,2-dichloroethene(cis) below 150 ppm. Any material with hazardous constituents in concentrations equal to or greater than the proposed health-based concentrations specified above shall be managed as F-listed hazardous waste.

This "contained-in" determination is limited to the contaminants specifically mentioned, the contaminated environmental media for which the data and assessment were submitted and reviewed and the activities conducted during this maintenance work. The waste must be managed in the manner described above.

If you have any questions regarding this "contained-in" determination, please contact me at (505) 827-1558 extension 1012 or John Young at (505) 827-1558 extension 1036.

Sincerely,



John E. Kieling  
Manager  
Permits Management Program

JEK:jry

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