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**ENVIRONMENT DEPARTMENT**

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File mailed  
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C.B.

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

December 6, 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) 3-056(c)  
LOS ALAMOS NATIONAL LABORATORY  
EPA ID#: NM 0890010515  
HWB-LANL-99-006**

Dear Dr. Browne and Mr. Taylor:

The Hazardous Waste Bureau (HWB) of New Mexico Environment Department has reviewed the request from Los Alamos National Laboratory (LANL) for a contained-in determination for environmental media generated during voluntary correction action (VCA) activities at PRS 3-056(c). The request is dated November 21, 2000 and referenced by ER2000-0687. The contained-in determination is being requested for environmental media contaminated with low concentrations of F-listed hazardous waste, specifically tetrachloroethylene and trichloroethylene. Under the contained-in policy, HWB has the discretion to make a site-specific determination that the environmental media contaminated with a listed waste need not be managed as hazardous waste if the hazardous constituents in the media are below health-based levels.

LANL has excavated approximately 900 cubic yards of polychlorinated biphenyl (PCB) contaminated environmental media to date. HWB has evaluated the analytical data for 70 roll-off boxes provided in Attachment A of the request. LANL reported the maximum concentrations of tetrachloroethylene and trichloroethylene as 0.017 and 0.002 parts per million (ppm) respectively. However, HWB has noted a typographical error in the reporting of tetrachloroethylene value; the correct concentration is 0.17 ppm. In addition, according to the additional information supplied via fax by LANL on December 4, 2000 the generation date for some of these boxes is in fact before September 11, 2000 as initially reported in the request letter. 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



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industrial worker scenario is appropriate for this determination because the environmental media excavated will be properly disposed of in an engineered landfill, further reducing the risk to human health and the environment.

HWB approves the request with the understanding that the excavated environmental media will be managed and disposed of appropriately as PCB remediation waste as specified in the request letter. HWB is aware that additional excavated media will be generated at this site before the completion of VCA. Any material with hazardous constituents in concentrations equal to or greater than the US EPA Region 6 Human Health Medium-Specific Screening Levels shall be managed as F-listed hazardous waste. This contained-in determination is limited to the contaminants specifically mentioned and the contaminated environmental media that is generated as a result of these VCA activities.

Since the reported maximum grab sample concentrations to date are also below land disposal restrictions (LDR) treatment standards in 40 CFR 268.48, additional treatment prior to land disposal is not required for the above F-listed constituents. Ms. Valarie Rhodes (LANL) informed Ms. Neelam Dhawan (HWB), by phone communication on 12/6/00, that samples acquired for the volatile organic compound analyses from the roll-off boxes were the required grab samples and not composites.

Future "contained in" determination requests need to be submitted in a timely manner as the last two requests have been submitted within a few days prior to the expiration of the 90-day storage limit. If you have any questions regarding this letter, please contact me at (505) 827-1558 extension 1036 or Neelam Dhawan at extension 1018.

Sincerely,



John Young  
LANL Corrective Action Project Leader  
Permits Management Program

JY:nmd

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cc:

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