

TR 106
LANL 03/1082/16
KSWA



University of California
Environmental Science and Waste Technology (E)
Environmental Restoration, MS M992
Los Alamos, New Mexico 87545
505-667-0808/FAX 505-665-4747



U.S. Department of Energy
Los Alamos Area Office, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544
505-667-7203/FAX 505-665-4504

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Date: November 9, 2000
Refer to: ER2000-0657

Mr. John Young, Corrective Action Project Leader
Permits Management Program
NMED – Hazardous Waste Bureau
2044 A Galisteo
Santa Fe, NM 87502

SUBJECT: CLARIFICATION TO “NO LONGER CONTAINED IN” REQUEST AND SUPPORTING DATA FOR THE TECHNICAL AREA (TA)-16-394 BURN TRAY

Dear Mr. Young:

The purpose of this letter is to clarify Los Alamos National Laboratory’s (LANL’s) letter (dated October 31, 2000 and referenced by ER2000-0629) requesting a “no longer contained in” determination for the environmental media generated during partial closure activities at the TA-16-394 Burn Tray and to provide analytical data that supports the request. This clarification and data submittal was requested by the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) during a November 7, 2000 phone conversation with LANL.

In the request letter to NMED-HWB, LANL reported that recently received analytical data indicate that low levels of five organic constituents (1,1,2,2-tetrachloroethane, tetrachloroethylene, trichloroethylene, toluene, and acetone) are associated with the excavated environmental media. However, several organic constituents were inadvertently omitted from the list that was presented in the text of the letter, namely 1,1,1-trichloroethane, 1,2-dichloroethane, 2-butanone, ethylbenzene, o-xylene and p/m xylenes. Additionally, trichloroethylene was correctly reported in the text but was omitted from the table included in the request letter. The table in the request letter reporting the detected organic constituents, their maximum concentrations, and proposed Medium-Specific Screening Levels (MSSLs) has been revised to include all these organic constituents as well as to reflect corrections to some of the previously reported maximum concentrations. The revised table is presented below:

Organic Constituent	Maximum Concentration (mg/kg)	MSSL (mg/kg)
1,1,2,2-tetrachloroethane	0.091	0.84
Tetrachloroethylene	0.087	13
2-butanone	0.031	26000
Toluene	0.26	520
Acetone	0.16	5800
Trichloroethylene	0.017	6
1,1,1-trichloroethane	0.039	1400
1,2-dichloroethane	0.040	0.75
ethylbenzene	0.015	230
o-xylene	0.036	280
p/m-xylenes	0.046	210*

*MSSL for m-xylene, which is lower than the MSSL for p-xylene.



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Attachment A contains analytical data resulting from 20 samples collected at locations surrounding (perimeter samples) and beneath (footprint samples) the TA-16-394 burn tray structure. These sample results represent the environmental media excavated during partial closure activities and are being used to characterize the excavated environmental media for disposal. All samples were submitted to a fixed laboratory for chemical analysis of Target Analyte List (TAL) metals, total petroleum hydrocarbons (TPH), semi-volatile organic compounds (SVOCs), volatile organic compounds (VOCs), high explosives (HE), and/or Toxicity Characteristic Leaching Procedure (TCLP) metals. Attachment B contains the schematics showing sample locations, depths, and results that were provided at the NMED-HWB/LANL ER monthly meeting on September 20, 2000. The following table summarizes the location, depth, and analyses for the 20 samples:

Sampling Location	Sample Number	Sample Depth (ft)	Analyses
Footprint samples corresponding to crack in former concrete structure	27	0-1	TPH, VOCs, SVOCs, HE
	29	3-4	TPH, VOCs, HE
	51	5-6	TPH, VOCs, SVOCs
Footprint samples from SE quadrant of former concrete structure	28	0-1	TPH, VOCs
	30	3-4	TPH, VOCs
	50	5-6	TPH, VOCs, SVOCs
Perimeter samples from W side of concrete structure	3	0-1	TPH, TAL metals, HE
	7	1-1.5	VOCs
	11	3-4	TPH, VOCs, TAL metals, HE
Perimeter samples from N side of concrete structure	4	0-1	TPH, TAL metals, HE
	24	0-1/1-1.5	TPH, VOCs, SVOCs, TCLP metals
	8	1-1.5	VOCs
	12	3-4	TPH, VOCs, TAL metals, HE
Perimeter samples from NE corner of concrete structure	5	0-1	TPH, TAL metals, HE
	9	1-1.5	VOCs
	13	3-4	TPH, VOCs, TAL metals, HE
Perimeter samples from E side of concrete structure	6	0-1	TPH, TAL metals, HE,
	25	0-1/1-1.5	VOCs, SVOCs, TCLP metals
Perimeter sample from SE corner of concrete structure	10	1-1.5	VOCs
	23	1-2	TPH, VOCs

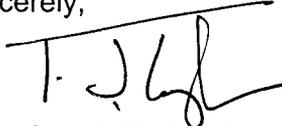
The clarification and data submittal contained herein should assist NMED-HWB with review of and response to LANL's original "no longer contained in" request. If you have any questions, please call Dave McInroy at (505) 667-0819 or Gene Turner at (505) 667-5794.

Sincerely,



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

Sincerely,



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

JC/TT/VR/eim

Enclosures: 1) Attachment A
2) Attachment B

Cy (w/enc.):

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ATTACHMENT A
SUPPORTING ANALYTICAL DATA
FOR TA-16-394 BURN TRAY

TA-16-394 FOOTPRINT DATA