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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 24, 2003

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EDMC

Mr. Joel B. Hebdon, Director
Regulatory Compliance and Analysis Division
United States Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352

Dear Mr. Hebdon:

Re: Letter, J. Hebdon, U.S. Department of Energy, to J. Hedges, Washington State
Department of Ecology, "Contained-In Determination for Soil Cores from Tank
Farms Work", 03-LOD-0030, dated May 21, 2003

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The Washington State Department of Ecology (Ecology) has received and reviewed the above referenced request. The information was evaluated to determine if the residual soil core samples and associated laboratory waste should be managed as dangerous waste in accordance with the principles of the "contained-in" policy.

Ecology understands that these data are representative of the contamination in the residual soil core samples and associated laboratory waste generated during the examination of core samples taken from boreholes S01052, S01014, B8809, C3832, C3830, and C3831. It is our understanding that the residual soil cores and associated laboratory waste do not designate as dangerous waste under federal or state characteristics and criteria. Based on the information received, the residual soil core samples and associated laboratory waste are contaminated with the following waste solvents that are listed dangerous wastes:

- F001 – 1,1,1-trichloroethane, carbon tetrachloride
- F002 – methylene chloride
- F003 – acetone, methyl isobutyl ketone
- F004 – o-cresol, p-cresol, cresylic acid
- F005 – methyl ethyl ketone

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Upon review, it was noted that laboratory results for carbon tetrachloride indicated it was non-detectable; however, the reported laboratory detection level for carbon tetrachloride was 5 parts per billion (ppb), which is above the Model Toxic Control Act (MTCA) groundwater protection value of 3.1 ppb. After further inquiry with laboratory staff, documentation from the contract laboratory was submitted documenting a Method Detection Limit (MDL) for carbon tetrachloride of 0.30ug/kg, well below the groundwater protection value.

These waste solvents were detected at concentrations that are below MTCA health-based levels. Under Ecology's current "contained-in" policy, contaminated media may be determined to no longer contain hazardous waste when the hazardous constituents in the media fall below site-specific, risk-based levels and the media does not exhibit a characteristic. Ecology has made the determination that the concentration of hazardous constituents in the residual soil core samples and associated laboratory waste are below MTCA Method B direct exposure values and are also below MTCA Method B values established for protection of the groundwater. These low levels of contamination do not warrant management of the material as a hazardous or dangerous waste. Therefore, Ecology will not require the United States Department of Energy to dispose of the residual soil core samples and associated laboratory waste as a listed waste at a dangerous waste treatment, storage and disposal facility (TSD).

Please note that this application of the "contained-in" policy is specific for the soil core samples and associated laboratory waste for which data were submitted and reviewed. It does not apply to any other soil core samples or laboratory waste. Data from any additional soil core samples and associated laboratory waste must be submitted to Ecology for review and approval.

If you have any questions regarding the "contained-in" policy or this determination, please feel free to contact Brenda Becker-Khaleel at (509) 736-3003.

Sincerely,



Jane Hedges
Cleanup Section Manager
Nuclear Waste Program

BBK:lkd

cc: Nick Ceto, EPA
Tony McKarns, USDOE
Roby Enge, PNNL
Todd Martin, HAB
Rick Gay, CTUIR

Pat Sobotta, NPT
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