



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION VI  
1201 ELM STREET  
DALLAS, TEXAS 75270

OCT 17 1985

MEMORANDUM

0381  
10/17/85

SUBJECT: Compliance Status of Los Alamos National Labs, Los Alamos, New Mexico

FROM: Raymond Magyar (RM)  
SIP Enforcement Section, 6T-ES

TO: Jim Highland  
Federal Assistance Section, 6E-FF

This is in regard to your inquiry on the compliance status of Los Alamos. At present, the source is only covered by NESHAP regulations and is currently in compliance.



16445

September 10, 1985

Region 6 Dallas

LOS ALAMOS NATIONAL LABORATORY (LANL)

ISSUE: Los Alamos National Laboratory RCRA Compliance Status

TIMING: Loss of Interim Status by November 8, 1985.

CONCERNED

GROUPS: Department of Energy

DISCUSSION: New Mexico Environmental Improvement Division (NMEID) made inspections at LANL on May 22, 1984. It was found that LANL did not have an adequate 40 CFR Section 265 (§265) groundwater monitoring waiver for the landfills at Area G and Area L. NMEID and LANL met five times over a period of one year to resolve violations from the May 1984 inspection. NMEID issued a Compliance Order (CO) to LANL on May 7, 1985. During the year LANL had not been able to develop adequate data to make a waiver demonstration. The CO had a schedule which allows LANL until March of 1987 to develop information necessary to determine if a §265 waiver is appropriate for LANL.

BACKGROUND: LANL has been operating the landfill at Area L and Area G (TA-54) under a groundwater monitoring waiver. NMEID feels that a §265 waiver would be appropriate, but more information needs to be developed to substantiate the §265 waiver request. NMEID issued the CO to LANL for the development of the additional groundwater information. The CO gives LANL until March of 1987 to develop and submit the information. It is doubtful if these landfill areas will be able to certify groundwater compliance. To certify compliance LANL would be required to have an approved waiver. To have an approved waiver LANL would have to submit the additional information and it would have to be approved prior to November 8, 1985. LANL does not believe they can even submit the information by March of 1987. On November 8, 1985, it is anticipated that LANL will lose interim status because the groundwater monitoring waiver is not approved.

LANL contends that the CO and schedule for submitting the waiver information by March of 1987 is unrealistic and that compliance is unattainable. LANL has had since January 26, 1983 to develop the information necessary to make the waiver demonstration. EPA and NMEID both have worked with LANL since 1983 to obtain adequate waiver information.

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October 17, 1985

Region 6 DALLAS

LOS ALAMOS NATIONAL LABORATORY, Los Alamos, New Mexico

ISSUE: What is the current status of the Comprehensive Environmental Assessment and Response Program (CEARP) at the Los Alamos National Laboratory?

TIMING: EPA, Region 6, can expect receipt of the Phase I CEARP report for review during March 1986.

CONCERNED GROUPS: EPA, Region 6; New Mexico Environmental Improvement Division.

DISCUSSION: Completion of the CEARP Phase I Installation Assessment was originally scheduled for October 1, 1985, with subsequent EPA review of the resulting report following internal peer review by the Department of Energy (DOE). The DOE reports this schedule is no longer valid for three reasons:

1. The Phase I records search is taking longer than anticipated;
2. DOE's internal review process is taking longer than anticipated; and
3. Four other Albuquerque DOE Operations Office facilities, none of which are in Region 6, have been given higher priority by the DOE and are currently undergoing DOE internal review.

BACKGROUND: The projected schedule for the CEARP program was given to EPA, Region 6, in November 1984. EPA Superfund staff conducted a site visit in December 1984. A recent telephone conversation with the Chief of the Environmental and Health Programs Branch at the Albuquerque DOE Operations Office noted a delay in the original schedule submitted to EPA, Region 6.

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September 17, 1985

Region 6 DALLAS

LOS ALAMOS PCB LANDFILL AND INCINERATOR

ISSUE: The current status of the Los Alamos PCB landfill and incinerator.

TIMING: Both disposal facilities have been approved for operation and are currently in compliance with their approvals.

CONCERNED GROUPS: Since the Los Alamos Laboratory is in an isolated area, no special groups became involved in the approval process.

DISCUSSION: The PCB landfill disposal and monitoring reports show that the facility is in compliance with its approval. The incinerator was only used one time for PCBs -- in June 1984. The facility is scheduled to be inspected in FY 86.

BACKGROUND: An application for approval of an onsite PCB landfill was received on January 25, 1979, and approved for Los Alamos Scientific Laboratory (LASL) PCB wastes on June 5, 1980. Only solid PCBs may be disposed at the facility which is located on a mesa 800 feet above the groundwater table. Materials disposed include transformer carcasses, PCB contaminated soils (<500ppm), rags and empty drums.

The PCB incinerator application was submitted on February 24, 1982. A trial burn was conducted in June 1982 and final approval issued on May 21, 1984. No waivers were required for the incinerator. Only DOE generated materials can be disposed at this incinerator. The incinerator is equipped with a high efficiency particulate removal system that was designed for incineration of radioactive waste materials.

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LOS ALAMOS NATIONAL LABORATORY

LOS ALAMOS, NEW MEXICO

ENFORCEMENT COMPLIANCE STATUS

° Facility Description:

This very large Department of Energy Facility performs basic research in atomic energy, atomic weapons, and high energy explosives. Wastewaters from the research originate as cooling tower blowdown, water treatment, boiler blowdown, condensers, air washer blowdown, radioactive wastewater, photographic wastewater, high explosive wastewater, printed circuit board development, compressed gas cylinder cleaning, and treated sanitary sewage. There are numerous discharge points located throughout the facility.

° Permit History:

BPT limitations were contained in the original December 30, 1974, permit, which required compliance by July 1, 1977. A short term BPT permit was issued October 16, 1978. The current BAT permit became effective September 25, 1981.

° Treatment Plant Description:

Radioactive wastewater is treated by physical/chemical treatment, stored, and tested prior to discharge. Most of the other process type discharges are treated by oil/water/solids separation or source control to eliminate pollutants. Sanitary discharges are handled by several different types of plants as follows:

1. Trickling filter plant;
2. Aerated lagoons with sand filters;
3. Septic tanks with polishing lagoons; and,
4. Imhoff tank with chlorine destruct.

° Compliance Status:

LANL has been on the QNCR since they became a major Federal Facility in 1980. The initial violations targeted for major enforcement action were, the steam plant, boiler blowdown, printed circuit board discharge, high explosives wastewater, and two small sanitary discharge. After lengthy negotiations a Federal Facility Compliance Agreement was finalized on March 9, 1983. Even before the FFCA was finalized LANL had become SNC at outfalls not covered by the FFCA. Region 6 issued an AO in February 1985, requiring corrective actions and schedules for all SNC discharges. To date LANL remains SNC at five sanitary discharges.

° Current EPA Action:

We are currently negotiating a second FFCA to cover the five sanitary discharges that are SNC. We recently sent a draft FFCA to LANL and the state agency for comments. Comments should be received by the end of September 1985, and a final FFCA should be signed shortly thereafter.

° Current State Action:

There is no current State action; because, the NMEID defers to EPA for enforcement at Federal Facilities.

° Citizen Action:

There is no known citizen action against LANL at this time. NRDC reviewed the files for this facility in late 1984.

C. Bruce Hale  
October 3, 1985