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Deputy Secretary

M E M O R A N D U M

TO: Los Alamos National Labs Enforcement File
FROM:  Jack Ellvinger, Acting Bureau Chief, HW Bureau
RE: Meeting of EID & LANL staffs on this date.
DATE: March 14, 1988

The attached list of individuals were present at a meeting to discuss the NOV response from LANL and other issues. The Lab staff started the discussion by questioning the mixed waste issue and when the State would have authorization for that segment of the program. They further discussed the need for the development of a storage site for the mixed waste.

The States answer to this was basically yes. This State will be seeking authorization for the mixed waste portion of the program. This will require some statutory changes and ultimately will require about eighteen months to adopt.

The State is receptive to entering any permit proposals for the development of an additional storage area for mixed waste. Both the State and EPA will jointly work on the development of a permit for this purpose.

Regarding the NOV:

- 1) The EID is very concerned with the illegal disposal of waste solvents at the Building 340 location. This practice though using a NPDES permitted outfall is still a violation of the Hazardous Waste Management Regulations.
- 2) The storage in excess of three times the allowed amount at the Area L location causes the Division concern. The Lab went to great pains to establish a location that had a sealed pad with curbs and roof for the safe storage of drummed wastes. The storage of wastes at



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this site on the ground without the benefit of any protection does not follow and is not allowed under the regulations.

- 3) There is a need for a ground water monitoring system that will satisfy the State that there has not been any release to the environment of hazardous waste or its constituents put in place by the Lab.
- 4) The Waste Analysis Plan poses some problems that need to be addressed. The WAP currently speaks to the sampling of 1% of the waste containers at the Area L location. The Part A notification lists the entire repertoire of D, U, P, and F wastes as waste that might be possibly generated at the Lab. The Division feels that the 1 % figure may have been appropriate at some time in the past. Today with our further education of the Lab and its workings and the continuance of this education this figure is no longer appropriate and will be addressed in the permit. Additionally, if the Lab feels that it is necessary to list all of the wastes in its Part A then the Lab needs to carry that to all other portions of the program. The personnel training, contingency plan and the preparedness and prevention portions need to be reflective of the wastes contained in the notification.

The Lab stated that the disposal of the solvents down the drain in Building 340 was not in line with policy at the lab. This is in fact a serious situation and "if that individual does this sort of thing again we'll cut his hand off". The Lab does feel that this type of disposal does not fall under the NPDES permit and is regulated by RCRA.

The lab admitted to the excessive quantity of HW at the Area L location. They asked us what could they do if their contractor was unable to move the waste in a timely manner and would the State prefer it if those waste were left at the various sites around the facility. The Lab was told that it was a management problem and that it was up to them to insure that the limits set under interim status not be exceeded. Also that it was illegal to keep HW at a point of generation for longer than 90 days.

Alice Barr asked about the groundwater monitoring that they had attempted and the waiver in general. She asked if the Lab should continue to drill more wells even though the were unable to drill deeper than 200 ft. I told Alice that I felt that this would be throwing good money after bad but =that the State would require a good accounting of the ground water by the use of several different methods such as neutron probes, side canyon monitoring of seeps etc.

Attendance List
 NOV meeting MARCH 14, 1988

| <u>NAME</u> | <u>ORGZ.</u> | <u>Phone #</u> |
|------------------------|-------------------------|----------------|
| J. A. PHOENIX | DOE-LM110 | 672-5288 |
| DM Lacombe | " | 667-4661 |
| Jack Ellinger | EID/Haz. Waste | 827-2925 |
| CK Crossman | EID (Haz Waste Bur) | 827-2923 |
| H. L. Jones | EID (Director's Office) | 527-2835 |
| Leon C. BORDUIN | LANL/HSE-7 | 667-2244 |
| Barbara B. Bailey | LANL/HSE | 667-4218 |
| Alice R. BARR | LANL/HSE-8 | 667-0820 |
| MARJORIE MARTZ EMERSON | LANL/HSE-8 | 667-5021 |
| Tom Anderson | LANL/HSE-20 | 667-4218 |