

JOHNSON CONTROLS

October 07, 1994
JENV.95-008

Los Alamos National Laboratory
Los Alamos, NM 87545

ATTN: Tony Grieggs, ESH-8, K490
MRB

THRU: Richard Perkins, Environmental Compliance Supervisor,
JENV

SUBJECT: SUBCONTRACT NO. 9-X86-Y7575-1, RECENT NEW MEXICO
ENVIRONMENT DEPARTMENT (NMED) RCRA INSPECTION - APPARENT
FINDING FOR JCI

The recent New Mexico Environment Department (NMED) RCRA inspection listed "TA-3-38-105 - JCI - A 55 gallon container holding the contents of a sump was noticed. It had been there for approximately six months. Why was it not characterized?." Information about the time period the drum was on site is incorrect. The drum was holding water from the pumping of a sump outside TA-38, Room 105, the Electric Shop. The drum was approximately one half-full. The water was pumped to the drum by JENV on August 22, 23, 24, and 25, in an effort to take a composite sample of the water that comes into the sump through (mostly) rainwater and (few) steam cleaning operations. The sample was submitted to LANL's Health & Environmental Chemistry Section (CST-9) on August 30, 1994, for semi-volatiles and volatile analysis.

The drum was labeled "Attention, this material is being analyzed for various chemical constituents. Removal of the container must be reported immediately to the JCI Environmental Laboratory, JENV, at 7-0104." The drum has now been emptied back into the sump where the water was found in the beginning. The drum has been removed at this time, and the results of the sampling analysis have not been received but should arrive by October 14, 1994. **The water from this sump is piped to the sanitary sewer and is not and never was suspected of being a hazardous waste.** The water was sampled because the pipe is clogged with sand and the sampling is routine for the cleanout procedure.



The CST-9 Analytical Service Agreement showing when the sample was collected and submitted has been attached to this memo for verification. Since the NMED RCRA inspection occurred in September, and the pumping of the sump occurred during the week of August 22, the finding stating the drum was there for approximately six months is incorrect. The empty drum was placed near the sump in the beginning of July, awaiting a rain event that would produce enough water in the sump to obtain a sample. Workers in the area may have incorrectly answered as to the length of time the drum was on site and contained water. The drum was empty from early July until August 22. Please change this finding to reflect these changes. Please direct any questions or concerns to Michael Brown or Michael Bailey, at 667-0104, M.S. A-199, JENV.

Very truly yours,



Michael Bailey
Environmental Engineer, JENV

Attachments: (1-Page), "EM-9 Analytical Service Agreement,"
Request Number 18722

cy:

T. Christopherson, BUS-5, MS P274
S. J. Calanni, VP/Gen Manager, JMGR
G. Vavra, Manager, Operations, OMDO
J. J. Lopez, Manager, JHSE
S. Eklund, FSS-1, MS P913
Michael Brown, JENV
Joe Richardson, JENV
file
Reading file

SM-38

Electric Pump

Submitted
sampled
8-30-94
MGB

EM-9 ANALYTICAL SERVICE AGREEMENT
Samples Assigned Report

REQUEST NBR
18722

ANALYTICAL SECTION: ORGNC

PROGRAM FUND CODE: U809

SAMPLE DISPOSAL: Discard

AGREEMENT DATE: 29-AUG-94

PRIORITY CODE: 3

SCREENING DATA: No Screening Data Required

CUSTOMER: MGB; Michael Bailey

MAIL STOP: A199

PHONE: 667-0104

SIGNATURE:

AB

TOTAL SAMPLES:

COUNTS:

ANALYSIS	TECHNIQUE	ANALYST	DUE	NBR SAMPLES
SEMIVOL	GCMS	AJL	23-SEP-94	2
VOLATILES	GCMS	DED	23-SEP-94	4

REMARKS:

SAMPLES:

ANALYSIS	SAMPLE	TECHNIQUE	MATRIX	TYPE	PRESERVATIVES	HAZARDS	COLLECTED	DUE	ANALST
SEMIVOL	94.20579-Cut-1	GCMS	WU	BLANK	NO PRESERVS	NO HAZARDS	25-AUG-94	23-SEP-94	AJL
	94.20580-Cut-1	GCMS	WU		KEEP AT 4 CELSIUS	NO HAZARDS	25-AUG-94	23-SEP-94	AJL
VOLATILES	94.20577-Cut-1	GCMS	WU	BLANK	NO PRESERVS	NO HAZARDS	25-AUG-94	23-SEP-94	DED
	94.20578-Cut-1	GCMS	WU	BLANK	NO PRESERVS	NO HAZARDS	25-AUG-94	23-SEP-94	DED
	94.20581-Cut-1	GCMS	WU		HCL	NO HAZARDS	25-AUG-94	23-SEP-94	DED
					KEEP AT 4 CELSIUS	NO HAZARDS	25-AUG-94	23-SEP-94	DED
	94.20581-Cut-2	GCMS	WU		HCL	NO HAZARDS	25-AUG-94	23-SEP-94	DED
					KEEP AT 4 CELSIUS	NO HAZARDS	25-AUG-94	23-SEP-94	DED