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JOHNSON CONTROLS

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JENV.95-021

Los Alamos National Laboratory
Los Alamos, NM 87544

ATTN: Michelle Cash, LANL/ESH-19, MS K498
THRU: Michael F. Brown, Deputy Manager, JENV
THRU: Richard J. Perkins, Env. Compliance Supv., JENV
SUBJECT: SUBCONTRACT NO. 9-X86-Y7575-1, CORRECTIVE ACTIONS
REGARDING APPARENT FINDING FROM NMED INSPECTION

In answer to your inquiry, JCI has indeed taken corrective actions with respect to the TA-3-38-103 apparent finding referenced in Dennis Erickson's 9-29-94 memorandum. The memo, ESH-DO-94-647-8, described the apparent finding as "An unlabeled container of paint waste was identified."

As a response to the apparent finding, the contents of this container was transferred to a paint waste drum in the SM-38-103 less-than-90 day hazardous waste storage area the very day of the NMED inspection, and marked with an accumulation start date. While this particular waste stream has historical analytical results to indicate that it should be managed as a hazardous waste, there have been enough changes in the types of paint being used at the Paint Shop that it was deemed prudent to collect a sample of this paint waste. It was submitted to CST-9 for a TCLP-metals analysis, under request number 19342.

On 9-22-94, a memo of reprimand was sent to the individual responsible for the waste, and to his immediate supervisor citing the deficiency and requesting that steps be taken to ensure the situation does not recur. This memo was in keeping with the penalty schedule which is an appendix of JCI's HS&E Manual Procedure "RCRA Hazardous Waste Storage and Removal Compliance." This schedule provides a consistent and graded approach to deficiencies in hazardous waste management practices by JCI employees.



When the results of the aforementioned sample are received from CST-9, we will forward a copy to your office. If you have any other questions or require any documentation, please call me at 7-0104.

Very truly yours,



Joe Richardson
Environmental Engineer, JCI/JENV

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