

**Los Alamos**

NATIONAL LABORATORY

**memorandum**

Environment, Safety, &amp; Health Division

To/MS: Michelle Cash, ESH-19, Hazardous  
and Solid Waste Management (K498)Thru/MS: Timothy C. Hower, ESH-10 Group  
Leader (K542)From/MS: John L. Conwell, Jr., ESH-10 Hazardous  
Waste Management Coordinator (K542)

Phone/Fax: 5-5237/5-4477

Symbol: ESH-10:94-291

Date: October 18, 1994

**SUBJECT: FINDING FROM THE ANNUAL RCRA INSPECTION AT TA-52-122**

I am surprised to note that the >90 Day Storage Area belonging to ESH-10 located at TA-52 North of Building 121 was mentioned in the Apparent Findings from the Annual Inspection Out-Briefing memo (ESH-DO:94-647-1) with the following comment:

- \* TA-52-122 - ESH-10 - This <90 day storage location did not have spill control or decontamination equipment on site and had no source of water. (moderate)

Tommy Montoya was present the day of the inspection and spoke to the inspector. He said he told the inspector that because of our business (Emergency Response to Hazardous Materials) we have extensive spill control equipment "here and readily available". When asked about the location of the equipment, Mr. Montoya pointed out our several response vehicles and trailers. Mr. Montoya said that when asked why the equipment was not located right next to the <90 Day Storage Area, he explained that if there were a spill, it is safer to have the equipment a safe distance away from the spill, rather than expose oneself to the spill to access the equipment. Mr. Montoya states that neither decontamination equipment nor water were mentioned in the interview. If the source of the comment about water is to meet fire protection requirements as per Subpart C in 40 CFR part 265, there is a fire hydrant 150 feet away from the storage cabinet.

As Mr. Montoya stated, the our response vehicles located at TA-52 contain equipment that is extensive and readily available. This equipment is for both spill control and decontamination. It would be redundant and inappropriate to locate additional material directly adjacent to the <90 Day Storage Cabinet.

Thank you for the opportunity to respond to this finding. If there are any further questions, please call me at 667-2592.

JC:yjh

Xc: ESH-10 Group File  
ESH-10 Waste Management File

16628

*10/20/94 - Discussion with Timothy Hower*

*① They are closing out this <90 day within the next 3 weeks.*

*② They currently have a cache of response + decon equipment within 100' of the location in a trailer as well as vehicles loaded with such equip. at the site.*

*They will temporarily locate some decon/spill control equip. adjacent to <90 days site pending closure.*