Los Alamos

Los Alamos National Laboratory
Los Alamos, New Mexico 87545

memorandum

TO: Rich Ryder, AOT-FM, MS H814

DATE: March 28, 1996

FROM: Tony Grieggs, ESH-19

MAIL STOP/TELEPHONE: K498/5-0451

SYMBOL: ESH-19:96-0111

SUBJECT: **RECOMMENDATION TO RESUME INSPECTIONS AT TA-53 SURFACE IMPOUNDMENTS**

Regarding the three surface impoundments located at Technical Area (TA) 53-166, I understand you believe the current inspection requirements to be more restrictive than what is necessary under the State and federal hazardous waste management regulations; I am unaware of any such discrepancies. I also understand you may not have performed any inspections since October 27, 1995. While you may wish to debate the requirements, I strongly recommend you resume daily inspection of the impoundments immediately. During several recent telephone conversations with you, Geri Rodriguez, ESH-19, also recommended that you resume inspections immediately. As you know, all three impoundments currently operate under interim status and are subject to the requirements established in the Laboratory's Interim Status Mixed Waste Inspection Plan and the RCRA Part B Permit Application for the TA-53 impoundments.

The Resource Conservation and Recovery Act (RCRA), the New Mexico Hazardous Waste Act (NMHWA) and the New Mexico Administrative Code (20 NMAC 4.1) require the operator of a surface impoundment to inspect the freeboard at least once each operating day to assure a minimum of two feet of freeboard remains in the surface impoundment to prevent overtopping of the dike by overfilling or storm. Also, the establishment of action leakage rates and adherence to standards for impoundments such as double liners and leachate collection systems may be required. Furthermore, the operator of any surface impoundment must inspect dikes and the surrounding area at least once a week to detect any leaks, deterioration, or failures.

The regulations require that inspections occur on a daily basis. Failure to conduct the required inspections constitutes non-compliance. Also, failure to conduct inspections or perform other mandatory actions, places the Laboratory at considerable risk and may result in issuance of a citation by the State and subject the Laboratory to fines and penalties. ESH-19 recommends the following actions: Resume inspections of the surface impoundments immediately; and, determine if AOT Division wishes to close the south impoundment and replace it with a tank system. If you have any questions please contact me at 5-0451.

ARG:em

Cy: Stan Schriber, DDAOT, MS H850
Dennis Erickson, DDESH, MS K491
Geri Rodriguez, ESH-19, MS K498
HSWS Circ File

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