

To: grieggst@lanl.gov
From: ryder@lanl.gov (Rich Ryder)
Subject: TA-53 Surface Impoundment Inspections
Cc: sos@lanl.gov, derickson@lanl.gov, geri@lanl.gov
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X-Attachments:

With regard to your memo recommending that I conduct daily inspections of the TA-53 surface impoundments (ESH-19:96-0111): Since late October I have been attempting to understand why the Laboratory has chosen to interpret 40 CFR 265.226 as requiring a daily check of the freeboard at the TA-53 impoundments when it is impossible, given the size of the lagoons, the available effluent sources (the sanitary lagoons are no longer in service despite your statement that they are technically "operating") and local meteorological conditions, for the freeboard to change by more than inches per WEEK.

In response to the implicit threat in your memo I have resumed the daily inspections, despite the fact that they provide no value added beyond that of the weekly inspection of dikes, fences, signs, etc. I find it extremely unhelpful for the Laboratory organization charged with interfacing between the operating organizations and regulatory agencies to not respond to what I think was a reasonable request for an explanation of the need for daily inspection other than "it's required". What hope is there for reducing the cost of business at the Laboratory if ESH-19 is not willing to question the need to do inspections where the result is known?

I would still like to receive an explanation of why you believe 40 CFR 265 requires a daily inspection to verify what is obvious to anyone who understands the status of the impoundments, i.e., that the freeboard cannot be exceeded in any period less than a few weeks under any conditions.

