

To: rodriguezg@eshmail.lanl.gov
From: ryder@lanl.gov (Rich Ryder)
Subject: Re: Surface Impoundments
Cc: pesenti@lanl.gov

I just received your note about the missing inspection record forms for TA-53-166. The reason I have not filed any forms with you since 10/27 is that I am still waiting for a clear statement about why daily inspections are "required". Our correspondence on the subject is included below.

From 10/29/95 (me to Michelle Cash):

I recently spoke with Ed Hoth, FSS-8, and they will no longer be funding JCI to perform the daily inspections of the 3 surface impoundments at TA-53. As you are probably aware, the EM program will be sampling and then remediating the no-longer-used sanitary lagoons. I have agreed to continue to perform the inspections of all 3 impoundments within my facility management team. I have reviewed 40 CFR 264.14-16 and 264.220-227, and have concluded that weekly inspection is sufficient to meet the requirements. Please check your interpretation and let me know if you think I have made an error. Also, I had some difficulty interpreting 264.216 to determine exactly what training a surface impoundment inspector needs. Please clarify that for me if you can. As soon as I hear from you we will begin to file our inspection reports with your office. Thanks for your help,

From 11/14/95 (me to Tony Grieggs after you replied to my message to Michelle):

Would you please send me a copy of the Interim Status document referenced below? I'd like to understand it before I think about contacting the state about an inspection frequency change. Also, could you tell me if the fact that the abandoned sanitary lagoons have been accepted into the ER program affects the inspection schedule for them?

>From: "GERI RODRIGUEZ" <RODRIGUEZG@eshmail.lanl.gov>
>To: ryder@lanl.gov
>Date: Tue, 14 Nov 1995 15:06:11 MST
>Subject: Inspections for TA-53 Surface Impoundments
>Reply-To: rodriguezg@eshmail.lanl.gov
>Priority: normal

>
>The schedule for inspections for the Surface Impoundments from the
>Interim Status document is what you have to follow. This document
>takes the place of the CFR for the impoundments. If a change needs
>to be made regarding the inspections the New Mexico Environment
>Department must be contacted. If you have any questions or need
>further explanation please contact Tony Grieggs at 5-0451 or E-mail
>grieggsT@eshmail.lanl.gov
>

From 11/21/95 (me to you):

Thank you for sending me the copy of the subject document. I'm assuming that this is the official Laboratory plan that has been agreed to by the Laboratory and the regulating authority (even though there are no signatures to indicate that) and that the Laboratory is obligated to follow it even if it is more restrictive than the applicable sections of the CFR. Is that right?

What can be done to modify the plan so that the Laboratory has only to meet requirements, not exceed them? For example, I note that in the case of surface impoundments the need for daily inspection is based on assuring that a minimum of 2 feet of freeboard is maintained. At TA-53, the NE and NW impoundments are



essentially dry, and the S impoundment has at least 6 ft of freeboard. RLW is transferred to the impoundment at a rate of approximately 1000 gallons/day -- not even enough to keep up with evaporation! Even if all of the radioactive water systems were to be dumped at once during a hundred-year rain there's no chance of overflowing the containment.

I'm looking for some relief from the need to do daily inspections and would appreciate any help that ESH-19 can give me.

From 11/28/95 (you to me):

>I am sorry I made a mistake the RCRA Interim Status Inspection Plan
>for Mixed Waste Units is just a proposal and has not been approved by
>NMED. You must still comply with 40 CFR 265.226. We will send you a
>message as to how you can comply with 40 CFR 265.222.

>
>I am sorry again for the confusion.

>

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Title: CLASS 1 PERMIT MODIFICATION FOR TRANSFER OF
PERMIT CO-OPERATOR TO THE LOS ALAMOS
NATIONAL LABORATORY HAZARDOUS WASTE
FACILITY PERMIT, APRIL 2006

Author(s): Solid Waste Regulatory Compliance Group (ENV-SWRC)

Submitted to: New Mexico Environment Department- Hazardous Waste
Bureau



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