

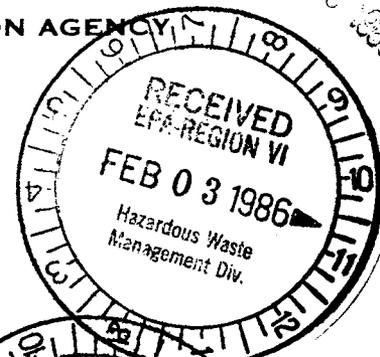


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270

January 31, 1986

0390
Permit



MEMORANDUM

SUBJECT: Compliance Status and Issues at Los Alamos National Laboratory, New Mexico
FROM: *William N. Rhea*
William N. Rhea, Chief
Hazardous Waste Compliance Branch
TO: Allyn M. Davis, Director
Hazardous Waste Management Division

Attached is a briefing sheet regarding the current compliance status and other issues at Los Alamos National Lab. Also attached is a map of the facility with hazardous waste unit areas highlighted. The known RCRA units are as follows:

- TA-54 Area G and Area L landfill container storage area
- TA-16 Area P landfill
HE burn pads
recently discovered surface impoundment
- TA-3 LiH storage area
- TA-50 Incinerator
5000 gal. treatment tank



14870

Briefing Sheet

Los Alamos National Laboratory (LANL) is a federal facility in Los Alamos, New Mexico. EPA I.D. Number NM0890010515. There are many issues regarding permitting and compliance at LANL.

- (1) LANL has requested a waiver from groundwater monitoring at TA-54, which includes the Area G and Area L landfills. The waiver was inadequate and NMEID issued a C.O. May 7, 1985, with a schedule which allowed LANL until March 1987 to submit the information required to substantiate the waiver. On November 5, 1985, Peter Pache of NMEID sent a letter to Tony Drypolcher at LANL approving the waiver. The Compliance Order has not been withdrawn and in the letter NMEID states that LANL is still required to submit the information required to substantiate a § 265 waiver. LANL cannot demonstrate for a § 264 groundwater monitoring waiver. As a result LANL has indicated they wish to close Area G and Area L. However, no closure plans have been submitted and only Area L has been included in the Part B. (Technical Section has a copy of the waiver and is reviewing it).

ISSUES:

- Does EPA accept NMEID's approval of the waiver? Does Peter Pache have the authority to approve such a waiver?
 - Regardless of the waiver, Area G has lost interim status because it was not included in the Part B. However, it is most likely still receiving solid waste and possibly RCRA waste.
 - Area L is still receiving waste and has a Part B. Is the waiver valid?
- (2) LANL was in violation of the inspection plan requirements in the May 7, 1985 Compliance Order for 100 days. NMEID proposed a civil penalty of \$100,000. LANL and NMEID are coming to some sort of an agreement whereby LANL will purchase safety equipment, provide training, and perform some environmental studies for NMEID.

ISSUES:

- If this is not yet settled, can EPA issue enforcement actions?
- Does this type of settlement involve conflict-of-interest?

- (3) It is suspected by EPA and NMEID that all units which should be regulated by RCRA have not been brought to our attention and have not been inspected. This is due to LANL's interpretation of the regulations and their reluctance to show inspectors areas which may be secured. There is a possibility that LANL has constructed a surface impoundment in the past year which should be RCRA regulated.
- (4) Los Alamos responded to EPA's request for information on SWMI's and releases by submitting a document which discussed locations where possible releases of radioactive elements may have occurred with one exception. LANL sent a copy of a two-page memo which discussed evidence of a release of organics in the Area L landfill.
- (5) Some radioactive-mixed hazardous waste is regulated under RCRA. When the definition of byproduct, source, and special nuclear material is published in the Federal Register, the number of units regulated at LANL may increase substantially.
- (6) The PCB-approved incinerator has been burning radioactive-mixed hazardous waste. It was constructed prior to 1980, but it was not included on the original Part A. A Part B has been submitted to permit the unit. NMEID is considering granting interim status for the incinerator. This will provide for disposal of the laboratory waste so that the landfills can be closed.
- (7) During the inspection on July 10-11, 1985, NMEID inspected a landfill at Area P. This landfill receives possibly reactive, Barium EP Toxic waste. This landfill has been receiving waste since 1980 and was never included in either the Part A or B. NMEID required LANL to submit a closure plan and cease receiving waste at the landfill. LANL has submitted the closure plan and NMEID is waiting for formal correspondence from LANL requesting closure before further action is taken on the closure plan. LANL has also "lost" a 250 gallon tank. The tank was on the original Part A, never went through closure, and LANL doesn't know where the tank is now.
- (8) The Part B is currently under review by NMEID after LANL responded to an NOD in November 1985.

are rather rare.

5. *Population Distribution.* Los Alamos County has an estimated 1983 population of 18 500 (based on the 1980 census adjusted for 1983). Two residential and related commercial areas exist in the county (see Fig. 7

area (including the residential areas of White Rock, La Senda, and Pajarito Acres) has about 6896 residents. About one-third of those employed in Los Alamos commute from other counties. Population estimates for 1983 place about 162 000 people within an 80 km (50 mi) radius of Los Alamos.

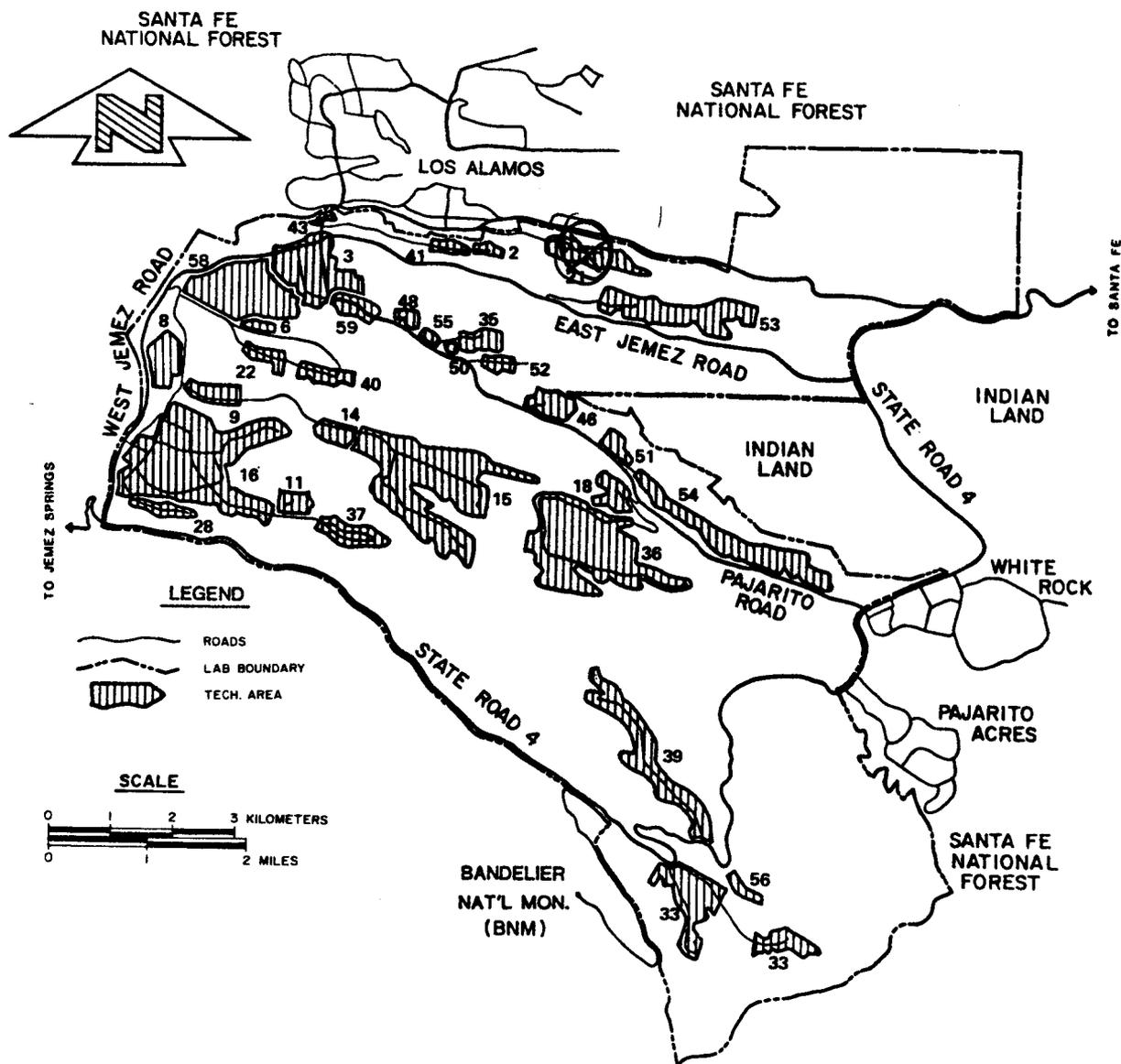
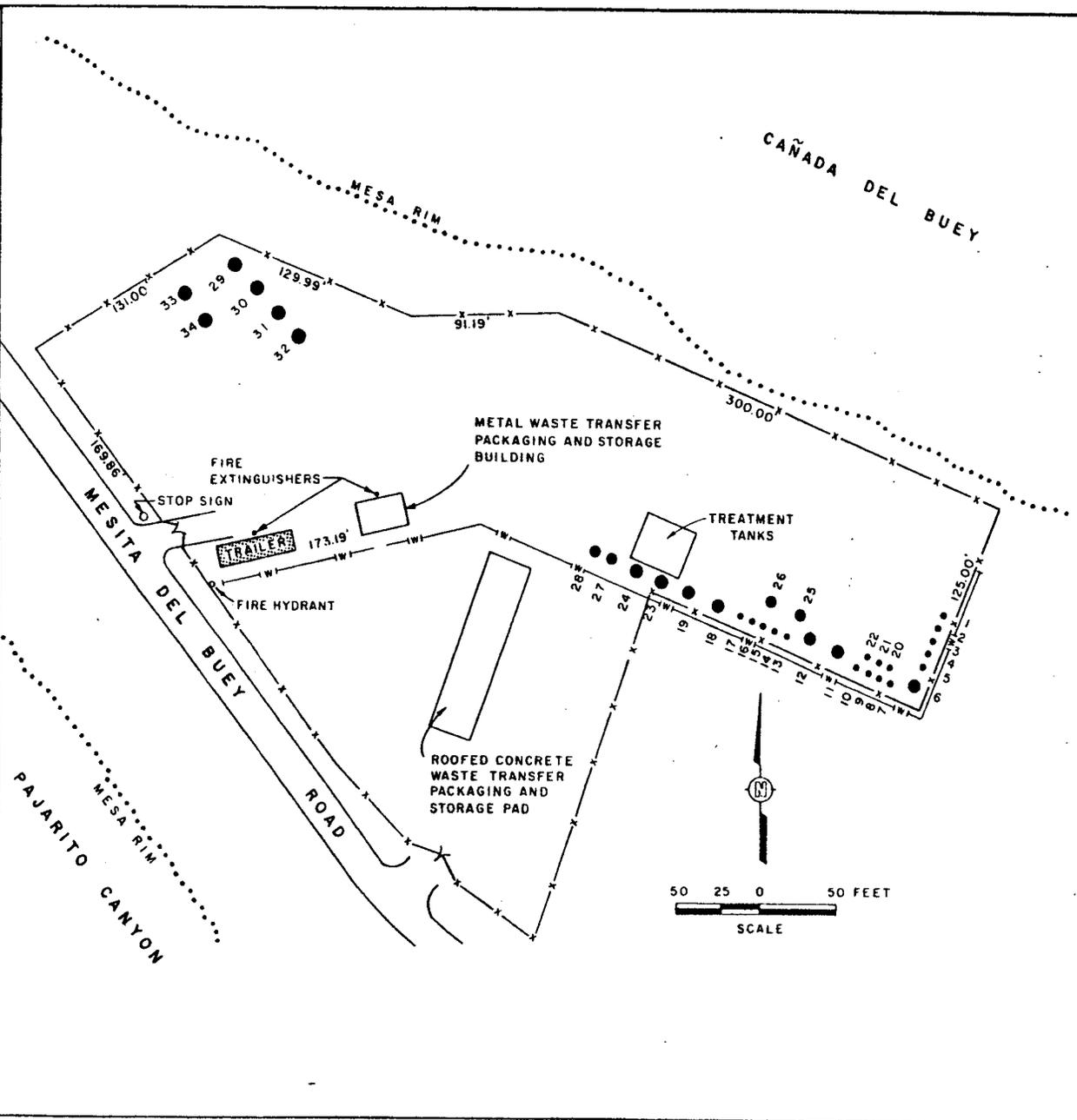


Fig. 7. Los Alamos National Laboratory's technical areas and adjacent communities.

Hazardous waste units located in these areas

DRAWN BY L.L.F. CHECKED BY J.F.F. APPROVED BY J.F.F. DRAWING NUMBER 846510-B-2



AREA L SHAFTS(1)
(INFORMATION CURRENT MARCH 1985)

SHAFT NO.	SHAFT DIAMETER (FEET)	DATE DRILLED	DATE CAPPED	CONTENTS
1	3	4/80	9/83	ORGANICS(2)
2	3	2/75	7/79	ACIDS & BASES
3	3	2/79	11/78	INORGANIC
4	3	2/75	5/80	ORGANIC
5	3	2/75	6/77	WASTE OIL
6	4	6/75	6/79	REACTIVE
7	3	6/75	6/79	REACTIVE
8	3	6/75	6/79	REACTIVE
9	3	6/75	6/79	GAS CYLINDERS
10	3	6/77	6/79	WASTE OIL
11	8	1/78	7/79	WASTE OIL/SOLVENT
12	4	1/78	7/79	WASTE OIL/SOLVENT
13	3	6/79	5/82	INORGANIC
14	3	6/79	5/82	REACTIVE
15	3	6/79	5/82	REACTIVE
16	3	6/79	5/82	GAS CYLINDERS
17	3	6/79	5/82	ORGANIC
18	8	6/79	6/80	WASTE OIL
19	8	4/80	5/82	WASTE OIL
20	3	4/80	9/83	INORGANIC
21	3	4/80	OPER	GAS CYLINDERS
22	3	4/80	9/83	ORGANIC
23(3)	8	4/82	3/84	WASTE OIL
24(4)	8	4/82	4/84	ORGANIC & WASTE OIL
25	6	9/82	5/85	INORGANIC
26	6	9/82	3/84	ORGANIC
27	4	1/83	2/85	SPECIAL(5)
28	4	1/82	5/85	SPECIAL
29	6	12/83	8/84	ORGANIC
30	6	12/83	8/84	ORGANIC
31	6	12/83	9/84	ORGANIC
32	4	9/84	9/84	ORGANIC
33	6	9/84	2/85	ORGANIC
34	6	2/85	5/85	ORGANIC

- NOTES:
 (1) ALL SHAFTS ARE APPROXIMATELY 60 FEET DEEP.
 (2) SHAFT ONE CONTAINS WASTES NOT IN DRUMS.
 (3) PRIOR TO SHAFT 23, LIQUIDS WERE DISPOSED OF IN DRUMS WITHOUT ADDING ABSORBENTS.
 (4) MIDDLE SECTION OF THIS SHAFT NOT USED.
 (5) USED FOR MISCELLANEOUS WASTE REQUIRING GREATER ISOLATION.

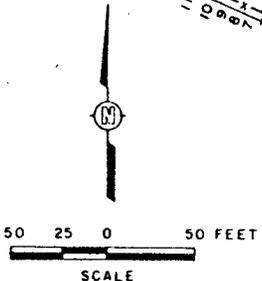


FIGURE 2-5
 TA-54 AREA L
 WASTE MANAGEMENT FACILITIES
 PREPARED FOR
 LOS ALAMOS NATIONAL LABORATORY
 LOS ALAMOS, NEW MEXICO
 IT CORPORATION

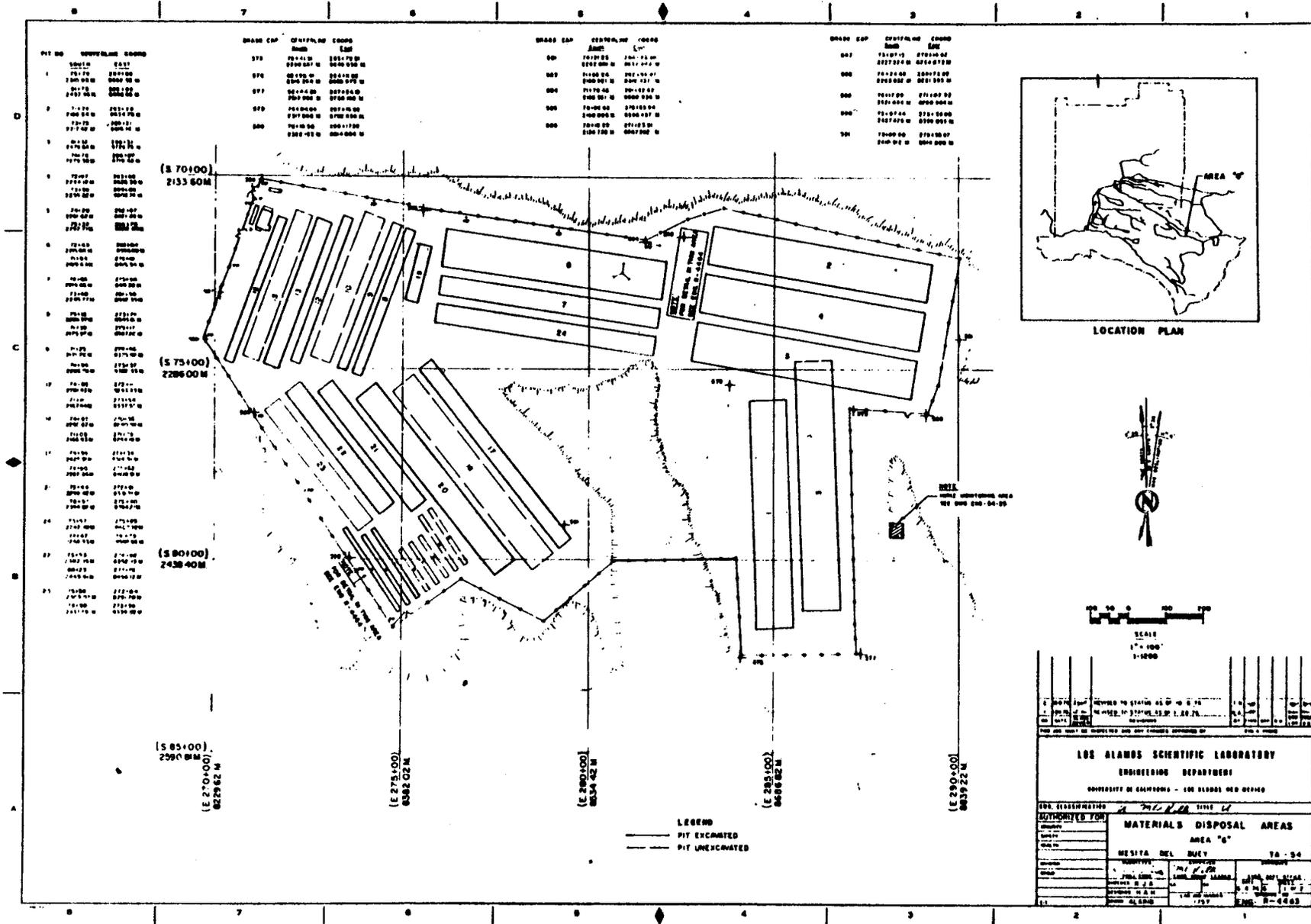


Fig. G-1.
 Materials Disposal Area G, Mesita del Buey, TA-54.