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Los Alamos National Laboratory
Los Alamos, New Mexico 87545

memorandum

Distribution
To: R. A. Morse, ADR *RM*
J. C. Browne, ADDRA *CB*
From: ADR:91-1231C

DATE December 9, 1991

MAIL ROOM TELEPHONE A1147-1600

DISPOSAL OF LIQUID WASTE AT TA-53

The New Mexico Environment Division (NMED) conducted inspections of the Laboratory's sanitary wastewater treatment facilities in August 1991. During their inspection of the TA-53rd wastewater lagoons, they observed an orange, milky liquid entering the lagoons. The NMED report of November 6, 1991, requires that the Laboratory prevent the discharge of undisclosed and/or unidentified waste streams into these lagoons.

We are asking each of you to remind your employees, visitors, users, contractors, and vendors to follow the attached guidelines for disposal of wastewater into sinks and drains (see Attachment 1). Please contact Roy Eohn (5-0452) or Mike Saladen (5-6085) of EM-8 if you have any questions concerning wastewater disposal, the requirements for operation and maintenance procedures for National Pollutant Discharge Elimination System (NPDES) Permit for Laboratory outfalls (see Attachment 2), or to report any unusual waste stream entering the lagoons.

MTB:am

- Attachment: 1. Guidelines for Disposal of Wastewater into Sinks and Drains
- 2. AR 9-6 Water Pollution Control

- Cy: R. B. Perkins, ADR, MS A114
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Los Alamos National Laboratory
Los Alamos, New Mexico 87545

memorandum

TO: Mike Saladen, EM-8, MS K490
DATE: December 9, 1991
FROM: M. T. Brandt, ADR/EST
MAILSTOP/TELEPHONE: A114/5-1155
BY: ADR/MTB-91-113
SUBJECT: ADR RESPONSE TO NEW MEXICO ENVIRONMENT DIVISION (NMED) REPORT

During the August 1991 inspection of the Laboratory's sanitary wastewater treatment facilities by the Surface Water Quality Bureau of NMED, an unidentified waste stream was observed entering the TA-53 sanitary lagoon (Outfall 05S). The liquid was reported to be bright orange and milky in appearance and was observed entering the lagoon while the inspection team was present. The NMED report stated that the influent splitter box was stained indicating to them that similar or identical liquids may have been discharged into these lagoons in the past. This memo summarizes actions taken to date in response to this observation.

In August, 1991 you and I discussed the difficulty of locating the source of an unidentified waste stream several days after it was observed, especially because a waste stream characterization study, which would identify sanitary waste streams and lines leading to the lagoons, has not been performed for TA-53. However, several measures have been taken since this incident to control unpermitted influent being discharged into the lagoons:

- Environmental, Safety and Health (ES&H) inspections were performed of various ADR facilities at TA-53 in September, 1991. During these inspections line managers and scientists were reminded not to dump liquid waste material down any drains or sinks. Instead, they were instructed to contact EM-8 for guidance regarding appropriate water pollution control measures and contact EM-7 for proper liquid waste disposal procedures. The findings of our inspections were documented in inspection reports. We recommended that any unpermitted discharge into drains leading to the TA-53 lagoons must be prevented.
- A letter from Fred Morse, ADR, and John Browne, ADDRA, is being prepared to alert Laboratory personnel at TA-53 to the importance of not discharging liquid waste into drains or sinks.
- A 5000.3A report was prepared for the above mentioned discharge at TA-53. Lack of administrative control and ownership was cited as the root cause of the unidentified waste discharge.
- ENG-8 has assumed ownership of the TA-53 lagoons and has a service order with JCI to operate and maintain them for the Laboratory.
- The Laboratory is currently developing action plans in response to the Tiger Team concerns regarding institutional problems in the area of NPDES compliance.
- ADR sent a request to EM-DO to conduct the waste stream characterization study at TA-53 as soon as possible.

In the meantime, I will again emphasize with ADR line managers the need to avoid discharging any liquid waste into sinks and drains. I will advise them that upon observing any suspect liquid discharge to the TA-53 lagoons they must: report the discharge immediately to EM-8; file a 5000.3A report; contact EM-8 to collect a sample of the unknown influent for chemical analysis; and, make every effort to identify the source of the discharge.

Should you have any questions, please contact me at 7-1900.

MTB:lm