

The following original(s) photograph(s) on this microfilm was not completely legible, therefore the Micro Image are Non-Readable.

Permit

Los Alamos

Los Alamos National Laboratory
Los Alamos, New Mexico 87545

DATE January 14, 1992
IN REPLY REFER TO ADO - 92-40
MAIL STOP A120
TELEPHONE (505) 667-9390
(FTS) 843-9390

Reports

Mr. Alex A. Puglisi, Health Program Manager
Facility Operations Section
New Mexico Environment Department
P.O. Box 26110
Santa Fe, New Mexico 87502

Dear Mr. Puglisi:

In reference to your letter of November 6, 1991, I am submitting the following information for your review concerning the corrective actions which the Laboratory has taken in regard to deficiencies noted during the NMED inspection of the Laboratory's sanitary wastewater treatment facilities conducted on August 29-30, 1991.

1. Action Plan dated December 20, 1991, to correct deficiencies noted in the Inspection Report of November 6, 1991.
2. Memorandum dated September 5, 1991, from Mike Saladen, EM-8, to Charles Richardson, ENG-8, requesting an action plan to address deficiencies.
3. Memorandum dated September 16, 1991, from Mike Saladen, EM-8, to Michael Brandt, ADR, requesting that operating groups at TA-53 locate the source of the unauthorized waste stream entering the TA-53 Sanitary Lagoons.
4. Memorandum dated September 25, 1991, from Michael Brandt, ADR, to M.V. Hoehn, MP-6, requesting that unauthorized discharges into drains be eliminated.
5. Memorandum dated September 26, 1991, from Michael Brandt, ADR, to D.H. White, MP-4, requesting that unauthorized discharges into drains be eliminated.
6. Memorandum dated October 15, 1991, from Allen J. Tiedman to Master Management describing procedures for compliance with the NPDES Permit (Administrative Requirement 9-6) and establishing guidelines for disposal of wastewater into sinks and drains.

An Equal Op



15179

The following original(s) photographed
on this date and are available
legible versions of the above image are
Non-Readable

Memorandum
N/C

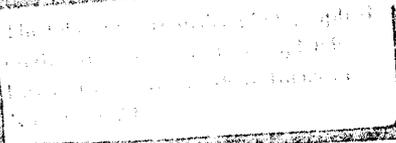
- Memorandum dated November 10, 1991, from Michael Brown, ENV, to the Superintendent, CA2D, requesting that unauthorized discharges into drains be eliminated.
8. Memorandum dated December 4, 1991, from R.B. Perkins, DADR, to T.C. Gunderson, EM-DO, requesting that the waste stream characterization study for TA-53 be advanced on the priority list for this work.
 9. Memorandum dated December 6, 1991, from L.E. Alexander, ENG-DO, to Allen J. Tiedman, ADO, providing details of the corrective actions which ENG-DO is taking to correct the deficiencies noted in the NMED Inspection Report.
 10. Memorandum dated December 9, 1991, from F.A. Morse, ADR, and J.C. Browne, ADDRA, to TA-53 operating groups reminding team of their responsibilities concerning the disposal of wastewater into sinks and drains.
 11. Memorandum dated December 9, 1991, from M.R. Brandt, ADP, to Mike Saladen, EM-8, summarizing the corrective actions taken concerning the unauthorized discharge to the TA-53 Sanitary Lagoons.
 12. Memorandum dated December 17, 1991, from T.C. Gunderson, EM-DO, to R. B. Perkins, ADR, advising that the waste stream characterization survey of TA-53 is now scheduled to begin in January, 1991, subject to the approval of the NMED and EPA.

Please be assured that the Laboratory is taking all appropriate measures to correct the deficiencies noted in your inspection report and to properly operate and maintain the sanitary wastewater treatment facilities in accordance with the conditions of the Laboratory's NPDES Permit and associated Administrative Orders.

Please advise Steven Rae of the Laboratory's Environmental Protection Group (EM-8) at 665-1859 if the corrective actions included in this submittal properly address the NMED's concerns and if any additional corrective actions to improve the operation and maintenance of the sanitary wastewater treatment facilities at the Laboratory are recommended by the NMED.

Sincerely,


Allen J. Tiedman
Associate Director
for Operations



Action Plan

Operation and Maintenance of Sanitary Treatment Facilities
Los Alamos National Laboratory
December 20, 1991

Based upon the findings of the Operation and Maintenance Diagnostic Evaluation Inspection Report concerning the NMED Inspection of the LANL Sanitary Wastewater Treatment Facilities on August 29 and 30, 1991.

Several treatment units at the Sewage Treatment Plants were not functioning properly.

	<u>Corrective Action</u>	<u>Date</u>
a.	<u>TA-3 and TA-16 Treatment Plants</u>	
	Provide as much recirculation as possible from the secondary clarifiers through trickling filters to improve biological growth.	Completed
	Perform operational testing at plant influent, primary clarifier outlet, secondary clarifier outlet and plant outlet to determine effectiveness through plant.	Jan. 1992
	Replace facilities with new SWSC Project.	Oct. 1992
b.	<u>TA-21 Treatment Plant</u>	
	Increase maintenance on sand filters. Increase sludge removal from clarifier and effluent pump pit.	Completed
c.	<u>Sanitary Lagoons</u>	
	Perform operational testing of lagoons to determine effectiveness.	Jan. 1992

Excessive amounts of foam and floating solids were being discharged from Outfall 01S (TA-3 Treatment Plant)

	<u>Corrective Action</u>	<u>Date</u>
	<u>TA-3 Treatment Plant</u>	
	Review TA-3 area for distinct sources of foam.	Completed

11/15/92
 11/15/92
 11/15/92
 11/15/92

Conduct comprehensive waste stream characterization Lab-wide to identify and control improper waste streams from entering treatment facilities.

Start date: Oct. 1990
 End date: July 1993

Replace TA-8 Treatment Plant with new SWSC Project.

Oct. 1992

3. Insufficient operation and maintenance records are kept for all treatment facilities.

Corrective Action

Date

Prepare new O&M Manuals for each treatment facility.

Completed

Prepare separate O&M forms for each treatment facility and implement detailed record keeping.

Completed

Initiate computerized O&M scheduling system.

Feb. 1992

4. Undisclosed and/or unidentified waste streams are being introduced into sanitary facilities which are permitted for domestic sewage.

Corrective Action

Date

Conduct waste stream characterization survey and identify sources of potential storm water inflow into TA-16 Treatment Plant.

Completed

Complete separation of potential sources of storm water inflow into TA-16 Treatment Plant.

Dec. 1992

Notify operating groups at TA-53 concerning the control of all potential hazardous and toxic discharges to the TA-53 Sanitary Lagoons.

Completed

Initiate waste stream characterization survey at TA-53.

Jan. 1992

Conduct comprehensive waste stream characterization Lab-wide to identify and control improper waste streams from entering treatment facilities.

Start date: Oct. 1990
 End date: July 1993

Provide Lab-wide guidance on responsibility for outfalls and allowable discharges down sinks and drains

Completed

The following photographs of the deficiencies noted during the May 23-24, 1990 Compliance Inspection were still in existence.

Deficiencies noted during a May 23-24, 1990 Compliance Inspection were still in existence.

<u>Corrective Action</u>	<u>Date</u>
Review status of all deficiencies noted in May 23-24, 1990, Compliance Inspection Report with EM-8, ENG-8, JCI and DOE.	Jan. 1992
Prepare close-out report concerning corrected deficiencies and action plan concerning problems not corrected.	March, 1992