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Permit

Los Alamos

NATIONAL LABORATORY

Los Alamos National Laboratory
Los Alamos, New Mexico 87545

Date: December 14, 1994
In Reply Refer To: FSII-DO-94-782
Mail Stop: K491
Telephone: (505) 667-4218

Mr. David Beach
Surface Water Quality Bureau
New Mexico Environment Department
1190 St. Francis Drive
P. O. Box 26110
Santa Fe, New Mexico 87502

Dear Mr. Beach:

SUBJECT: NPDES COMPLIANCE INSPECTION, OCTOBER 27-28, 1994

I appreciate the information provided to our Water Quality and Hydrology staff at the out-briefing following the NPDES Permit Compliance Inspection of October 27-28, 1994. The following actions have been taken by the Laboratory in response to these issues:

- (1) **Action:** Copies of the Minimum Detection Limits for metals and Quality Assurance/Quality Control Plans for the contract laboratories requested during the inspection have been provided to NMED.

Completion Date: Done - December 6, 1994

- (2) **Action:** The secondary containment around the effluent holding tanks at the TA-21 Radioactive Wastewater Treatment Plant (WWTP) was found to be inadequate. This finding was identified under the Laboratory's Waste Stream Characterization Program and is covered under Administrative Order (AO) VI-94-1242. CST-13 will construct secondary containment around Tanks 112 and 113 at TA-21, Building 257 pending evaluation and availability of funds.

Completion Date: CST-13 will request funding by January 15, 1995

- (3) **Action:** A work order has been written to install level measuring gauges at TA-21 Radioactive WWTP that will be comparable with those at TA-50, Building 1. Transfer line integrity was tested by a third party contractor at 450 psi for four hours with no drop in pressure. This indicates the transfer line is intact with no leaks.

Completion Date: Done - November 1994

- (4) **Action:** The TA-46 Sanitary Wastewater Systems Consolidation (SWSC) Plant effluent flow meter was calibrated and found to be 99.83% accurate. The effluent totalizer meter was placed on a two week calibration schedule.

Completion Date: Done - October 28, 1994

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- (5) **Action:** JCI now conducts weekly pH analysis at NPDES Outfall 13S (SWSC Plant).
Completion Date: Done - September 15, 1994
- (6) **Action:** The JCI sanitary wastewater sampling form has been modified. JCI sampling personnel implemented this form for their sampling procedures. Additionally, JCI laboratory bench sheets were modified to reference the 18th Edition of Standard Methods for Examination of Water and Wastewater.
Completion Date: Done - November 2, 1994
- (7) **Action:** Per your request, attached are copies of the August and September, 1994, Outfall 051 laboratory bench sheets.
Completion Date: Done - December 14, 1994

The NMED inspection team indicated that the effluent flow monitoring at the TA-50 Radioactive WWTP for the NPDES Outfall 051 may not be adequate. Please note, all effluent monitoring required by the NPDES permit is being conducted. Tank discharges are made in calibrated, known quantity batches and are used for flow reporting under the permit.

To address NMED concerns regarding the inadequacy of the flow meter at Outfall 128, ESH-18 will continue to conduct weekly flow calibrations of the flow measuring device and make adjustments as needed, until the outfall is eliminated in January, 1995. Additionally, in response to NMED's comments regarding litter on the grounds at the TA-50 facility, a work order has been issued and clean up has been completed.

Thank you for the information presented at the out-briefing and courtesies extended by your team during the inspection. As soon as we receive the final inspection report, we will provide you with additional information addressing the findings. Please call Alex Puglisi at 667-4882 or Mike Saladen at 665-6085 if you have any questions or need additional information.

Sincerely,


Dennis J. Erickson
Division Leader
Environment, Safety, and Health Division

ACM:MTS/vc

Attach: a/s

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NPDES Industrial Discharge Monitoring

EPA Serial No. 051

Sample No. _____

Date Sampled 08/02/94

TA/Bldg. TA-50-1

Sampled by Plant Operator - [Signature]

Flow 80743 liters/day

Estimated Measured

15:50 Time

Samples maintained under chain of custody

Discharge description:

color: none - clear foam or floating solids: none

odor: none

Comments: none

Preservative(s): HNO₃ to pH <2 _____ H₂SO₄ to pH <2 _____ Refrigeration _____

SAMPLED WEEKLY:

Analysis	Results/Concentration	Time Collected	Date Began	Time Began	Method	Analyzed by
pH					150.1	
TSS					160.2	
C.O.D.					410.4	
Cd(T)					213.2	
Pb(T)					239.2	
Cu(T)					220.1	
Fe(T)					238.1	
Zn(T)					289.1	
Hg(T)					245.2	
Cr(T)					218.2	
Ni(T)					249.1	

Preservative(s): HNO₃ to pH <2 H₂SO₄ to pH <2 _____ Refrigeration

SAMPLED MONTHLY (FIRST WEEK OF MONTH):

TOTAL N					351.3	
Nitrate-Nitrite(as N)					353.3	
NH ₃ -N					350.1	
*TTO					4G	
					CFR 136	
					903.1	
Rs 226 + 228						

* SEE ATTACHED TTO LIST

REVIEWED BY _____ DATE: _____ (CST-9)

REVIEWED BY _____ DATE: _____ (ESH-8)

July 28, 1994

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Sample No. 44-76463

CHAIN OF CUSTODY RECORD

Relinquished by (Signature)	Date	Time	Received by (Signature)
<i>[Signature]</i>	8/4/94	0945	<i>W. Bauman</i>
Relinquished by (Signature)	Date	Time	Received by (Signature)
Relinquished by (Signature)	Date	Time	Received by (Signature)
Relinquished by (Signature)	Date	Time	Received by (Signature)
Relinquished by (Signature)	Date	Time	Received by (Signature)
Relinquished by (Signature)	Date	Time	Received by (Signature)
Relinquished by (Signature)	Date	Time	Received by (Signature)
Relinquished by (Signature)	Date	Time	Received by (Signature)
Relinquished by (Signature)	Date	Time	Received by (Signature)
Remarks			

1 gas cylinder (HNO₃) 44-76463

4 1-litre amber glass (NA)

Returned 2 1-litre containers to customer

4 40-ml clear glass (HCl)

Returned 2 40-ml containers to customer

July 27, 1994

NPDES Industrial Discharge Monitoring

EPA Serial No. 051

Sample No. _____

Date Sampled 08/02/94

TA/Bldg. 21-50-1

Sampled by Plant Operator - L. Hall

Flow 90742 liters/day

Estimated Measured

1550 Time

Samples maintained under chain of custody

Discharge description:

color: clear - none foam or floating solids: none

odor: none

Comments: none

Preservative(s): HNO₃ to pH <2 H₂SO₄ to pH <2 Refrigeration

SAMPLED WEEKLY:

Analysis	Results/Concentration	Time Collected	Date Began	Time Began	Method	Analyzed by
pH	6.56 units ± 0.1	1550	8/18	1605	150.1	HL
TSS	4 ± 1 mg/L		8/18	200	180.2	"
C.O.D.	18 ± 10 mg/L		8/22	900	410.4	RS
Cd(T)	5 µg/L ± 2 µg/L		9/06	8:50	213.2	PEC
Pb(T)	10 µg/L ± 4 µg/L		9/06	8:30	239.2	PEC
Cu(T)	110 ± 11 mg/L		9-7-94	7:30	220.1	MBG
Fe(T)	330 ± 33 mg/L		"	"	236.1	MBG
Zn(T)	16 ± 5 mg/L		"	"	289.1	MBG
Mn(T)	0.1 mg/L ± 0.1 mg/L		8/04	804/74	245.2	PEC
Cr(T)	2 ± 1 mg/L		9-7	7:30	218.2	MBG
Ni(T)	60 ± 5 mg/L		"	"	248.1	MBG

Preservative(s): HNO₃ to pH <2 H₂SO₄ to pH <2 Refrigeration

SAMPLED MONTHLY (FIRST WEEK OF MONTH):

TOTAL N	52 ± 5.5 mg/L		8/11	700	351.3	MBG
Nitrate-Nitro (as N)	14 ± 2 mg/L	} 20.5	8/12	900	353.3	MBG
Nitrite-Nitro (as N)	1.5 ± 0.1 mg/L		8/24	1:50	350.1	MBG
NH ₃ -N	3.5 ± 0.3 mg/L		8/4	11:00	40	MBG
TTO	D.E				CFR 138	
Ra 226 + 228	0.8 pCi/L				903.1	MBG

* SEE ATTACHED TTO LIST

REVIEWED BY D. G. Smith DATE: 9/9/94 (CST-9)

REVIEWED BY _____ DATE: _____ (ESH-8)