



GARY E. JOHNSON
GOVERNOR

*file
TA-50*

Permit

State of New Mexico
ENVIRONMENT DEPARTMENT
DOE OVERSIGHT BUREAU
2044 A Galisteo Street
P.O. Box 26110
Santa Fe, New Mexico 87502

*Bill [initials]
Ron [initials]
Bartman [initials]
file
Teri [initials]*

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

October 6, 1995

Joseph Vozella, Chief
Environment, Safety, and Health Branch
Department of Energy
Los Alamos Area Office
Los Alamos, NM 87544

**Re: Noncompliance with Effluent Limitation in NPDES Permit
NM0028355: TA-50, Building 1, Outfall 051**

Dear Mr. Vozella:

Discharge Monitoring Reports submitted to the U.S. Environmental Protection Agency (USEPA) for the months of June and August of 1995 report discharges of 48.4 pCi/L and 33.0 pCi/L of radium 226 + 228 respectively. These discharges exceed the NPDES permit limit of 30 pCi/L for radium 226 + 228.

The exceedences of the NPDES discharge limit for radium 226 + 228 in June and August of 1995 underscores the need to implement tertiary treatment of the TA-50 Radioactive Liquid Waste Treatment Plant effluent. Tertiary treatment would virtually eliminate the periodic discharge of effluent that exceeds DOE Order 5400.5 Derived Concentration Guidelines (DCGs), the State of New Mexico Radiation Protection Regulations (NMRPR) and the National Pollution Discharge Elimination System (NPDES) permit limits.

DOE Order 5400.5, II.3a(1)(b) Plan and Schedule for Implementation states:

A plan and schedule to install waste treatment systems in existing facilities, if justified by a BAT analysis, shall be developed within 6 months of the issuance date of this Order, to permit compliance with paragraph II.3a(1) at the earliest practicable time.

The issuance date of DOE Order 5400.5 was February 8, 1990. The BAT analysis has taken over five years to complete during which time DCG guidelines and NMRPR standard exceedances have continued to occur.



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A Reverse Osmosis (RO) unit has been successfully used as a pilot project at TA-21, to pre-treat Decommission & Demolition (D&D) waste water, prior to transfer to TA-50. Conversations with technical staff at TA-50 indicate that the BAT analysis addresses this system as an effective option. It would be prudent to install a similar system at TA-50 to polish effluent prior to discharge into Mortandad Canyon. This interim measure would be appropriate until a final decision is made on the fate of the TA-50 Radioactive Waste Treatment Facility. The installation of this system would merely require notification of the U. S. Environmental Protection Agency and the State of New Mexico Environment Department and could be dealt with from a regulatory basis as an experimental process.

DOE actions taken to assure the State of New Mexico and the USEPA of compliance with DOE 5400.5 DCGs and the State of New Mexico Radiation Protection Regulations and WQCC Stream Standards may avert enforcement actions in the future.

If you have any questions please contact Ralph Ford-Schmid at 827-1536.

Sincerely,



Steve Yanicak,
Point of Contact/LANL,
NMED, DOE OB

SY:rfs

cc: Neil Weber, Chief, NMED, DOE OB
Jim Piatt, Chief, NMED, SWQB
Benito Garcia, Chief, NMED, HWRMB
Marcy Leavitt, Chief, NMED, GWPRB
Cecelia Kernodle, U.S. EPA, Region 6, 6EN-WT
Ivan Trujillo, DOE/LAAO AIP POC, MS A316
Steve Rae, UC-LANL/ESH-18, MS K490
Steve Hansen, EM-7, MS E518