



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

LANL: Permit (SRA PCB Permit)

June 25, 1996

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Joseph C. Vozella
Acting Asst. Area Manager
Office of Environment and Projects
Department of Energy
Los Alamos Area Office
Los Alamos, NM 87544

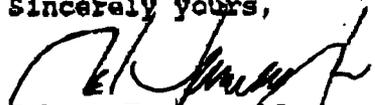
Dear Mr. Vozella:

Your current approval to landfill polychlorinated biphenyls (PCBs) issued on June 5, 1980, has been reviewed by our office and is being reissued by this letter pursuant to Section (6)(e) of the Toxic Substances Control Act (TSCA). The approval, dated June 5, 1980, was granted after Los Alamos National Laboratory (LANL) demonstrated through design, geologic, and climatic information, that it could safely landfill PCBs.

After reviewing additional geologic and analytical information submitted by LANL on December 22, 1994, EPA has concluded that the continued disposal of PCBs at the Technical Area 54, Area G, landfill will not pose an unreasonable risk to human health or the environment from PCBs. This approval adds certain conditions that were not a part of the original approval that are designed to ensure improved oversight of LANL's PCB disposal operations.

Enclosed are the Conditions of Approval. This approval shall expire at midnight, on the same day and month as the date of this approval letter, five years after issuance.

Sincerely yours,


Robert Hanneschlager, P.E.
Acting Director
Multimedia Planning
and Permitting Division

Enclosure

cc: Mark Weidler
New Mexico Environment Department

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LOS ALAMOS NATIONAL LABORATORY**PCB LANDELL APPROVAL CONDITIONS****I. LOCATION OF FACILITY**

The PCB disposal area is located in Technical Area 54 (TA-54), Area G, of the Department of Energy's (DOE) Los Alamos National Laboratory, Los Alamos, New Mexico.

II. PCB DISPOSAL FACILITIES AUTHORIZED**A. PCB Pits and Shafts Authorized:**

1. Pits located in TA-54, Area G; and,
2. The PCB Shaft Field located in TA-54, Area G.

B. Authorization to Operate Additional Pits or Shafts:

LANL shall not commence disposal in a new PCB disposal area other than Area G until it has notified the EPA Region 6, OK/TX RCRA Permits Section, in writing and received written approval from EPA. For new pits or shafts within Area G, LANL shall submit to the EPA Region 6, OK/TX RCRA Permits Section, a Notification of PCB Activity (EPA form 707101-53) 30 days before beginning to use the new pit or shaft.

C. Expansion of Existing Authorized Pits or Shafts:

Any pit or shaft authorized under condition II.A. of this section which LANL intends to expand shall require notification to the EPA Region 6, OK/TX RCRA Permits Section, before any new PCBs may be disposed in the expanded facility.

D. New PCB Storage Areas:

PCBs shall not be stored in a new storage area, other than those authorized in condition II. B. above, without first notifying the EPA Region 6, OK/TX RCRA Permits Section, before PCBs may be stored in the new storage facility. LANL shall submit to the EPA Region 6, OK/TX RCRA Permits Section, a Notification of PCB Activity (EPA form 707101-53) 30 days before beginning to use the new PCB storage area.

III. FACILITY DESIGN, CONSTRUCTION, AND OPERATION**A. General Design and Construction Requirements:**

1. The PCB pits shall comply with 40 CFR 761.75 except

for the following provisions:

- a. 761.75 (b)(1): Soils of relatively impermeable formations;
- b. 761.75 (b)(3): Hydrologic conditions requiring monitoring wells and leachate collection;
- c. 761.75 (b)(5): Topography of low to moderate relief;
- d. 761.75(b)(6)(ii): Ground water monitoring wells installed around the site; and,
- e. 761.75 (b)(7): Leachate collection system installed.

A waiver to these conditions is granted based upon EPA's review of the design of the pits and shafts and geology reports on the area. The volcanic tuff, the arid conditions, the non-liquid waste materials, and the 800-foot depth to ground water provides an effective barrier between the bottom of the pits and shafts and the ground water table. Since no pumpable ground water exists, a leachate collection system would serve no useful purpose.

2. The PCB shafts shall comply with 40 CFR 761.75 except for the provisions listed in III.A.1. above for the reasons stated in that section.

3. No PCB liquids or items containing PCB liquids shall be placed in a disposal pit or shaft after the effective date of this approval.

B. General Operating Requirements:

1. PCB wastes to be disposed in pits or shafts located in TA-54, Area G, shall be logged on the Waste Profile Request Form ES&H 10-3B, or its equivalent.

2. Disposal of PCB wastes shall comply with Administrative Requirements, or their equivalent, (AR) 10-2, 10-3, and 10-4 as they apply to PCB wastes.

C. PCB Pit Operating Requirements:

1. PCB wastes to be disposed in a pit shall be logged in LANL's waste tracking system which shall include date of disposal, and type and quantity of waste

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disposed.

2. Large quantities of PCB contaminated soil and debris which are not containerized shall be transported in lined trucks with a covering sufficient to prevent spillage or wind dispersion of the PCB contaminated material. Transport shall not occur after sunset or before sunrise.

D. PCB Shaft Operating Requirements:

1. PCB wastes disposed in a shaft shall have the date of disposal, type and quantity of waste disposed recorded in a log. This information shall be made available to EPA upon request.
2. Open shafts shall be covered to prevent accidental injury or the entrance of precipitation.
3. No PCB liquids or items containing PCB liquids shall be placed in a disposal shaft.

E. Storage Facility Area Requirements:

1. The PCB storage facility, located in Area L, shall comply with PCB storage requirements in 40 CFR 761.65.
2. PCBs shall be properly marked in accordance with 40 CFR 761.45.
3. All PCB items shall be logged showing date removed from service for disposal and the date the PCB item was sent from storage for disposal. This information shall be provided to EPA upon request.

F. Surface and Ground Water Monitoring Requirements:

1. Samples collected for compliance with this approval shall be analyzed for the parameters listed in 40 CFR 761.75(b)(6)(iii).
2. Samples analyzed for PCBs shall follow EPA approved procedures and methods. The procedures and methods used shall be recorded along with the data.
3. Stormwater runoff sampling and inspections around pits and shafts shall be in accordance with the Stormwater Pollution Prevention Plan for TA-54, Area G, and shall include those parameters specified in III.F.1. above.

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4. Once annually, a sample shall be collected from the springs located on the west bank of the Rio Grande. These springs are designated Spring #3 and Spring #4 and are located at 35°49' north latitude, 106°11' west longitude; and 35°47' north latitude, 106°12' west longitude respectively. The samples shall be analyzed according to conditions III.F.1. and III.F.2. above.

IV. CLOSURE AND POST CLOSURE

A. Records required under 40 CFR 761.180 (d) and (f) shall be maintained for the times specified after the pits or shafts have been closed.

B. LANL shall notify the EPA Region 6, OK/TX RCRA Permits Section, in writing within 30-days of facility closure that an authorized pit or shaft under this approval is being closed.

V. STANDARD APPROVAL CONDITIONS

A. Severability:

The conditions of this authorization are severable, and if any provision of this authorization, or any application of any provision, is held invalid, the remainder of this authorization shall not be affected thereby.

B. Duty to Comply:

LANL shall comply with all Federal, State, and local regulations, approvals, and permits.

C. Personnel Safety:

LANL's personnel safety requirements and procedures for PCB handling, storage, transport, and disposal shall comply with Occupational Safety and Health Administration requirements.

D. Duty to Mitigate:

LANL shall correct any adverse impact on the environment resulting from noncompliance with this approval.

E. Proper Operation and Maintenance:

LANL shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed and used to achieve compliance with the conditions of this approval. Proper

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operation and maintenance include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls including appropriate Area G quality assurance procedures.

All transport vehicles owned by LANL used for the transport of PCBs shall be properly maintained, inspected, and certified in writing by a responsible official of the company as meeting applicable safety standards under the Department of Transportation regulations before PCBs are transported on public highways. Copies of all certifications shall be kept at the facility and shall be available for inspection on request.

F. Duty to Provide Information:

LANL shall furnish any relevant information which EPA may request to determine whether cause exists for modifying, revoking, reissuing, or terminating this approval, or to determine compliance with this approval. LANL shall also furnish, upon request, copies of records required to be kept under the TSCA PCB regulations.

G. Inspection and Entry:

LANL shall allow an authorized representative, upon presentation of credentials and other documents as may be required by law, to:

1. Enter the LANL facility where PCBs are being handled, stored, treated, or disposed;
2. Have access to and copy, at reasonable times, any records that must be kept under the TSCA PCB regulations;
3. Inspect any facilities, equipment (including monitoring and control equipment), practices, or operations required under this approval or the TSCA PCB regulations; or,
4. Sample or monitor for the purpose of assuring that the LANL facility is operating in compliance with the conditions of the approval or the TSCA PCB regulations.

H. Monitoring and Records:

LANL shall comply with all monitoring and record keeping requirements for PCB landfills and storage facilities. All PCB records, documents, and reports shall be maintained at centralized locations at the LANL facility, and shall be made available for inspection by authorized EPA

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representatives. All records required by this approval shall be written in ink or typed. Any modification or correction of the records must be initialed and dated by the person performing the change.

I. Notice of Transfer of Ownership:

LANL shall notify EPA at least ninety (90) days before transferring ownership of the facility. LANL shall also submit to EPA at least ninety (90) days before such transfer a notarized affidavit signed by the transferee stating that the transferee shall abide by the terms of this approval.

J. Twenty-four Hour Reporting of Noncompliance:

If at any time LANL becomes aware of a violation of the conditions of this approval, it shall notify the EPA Region 6, OK/TX RCRA Permits Section, by telephone within 24 hours, and shall submit a written report within five (5) days.

K. Other Information:

When LANL officials become aware that LANL has failed to submit any relevant facts in its application, or submitted incorrect information in any report to EPA, LANL shall promptly submit such facts or information to EPA.

L. Operation of the Facility:

LANL shall maintain an adequately trained onsite inspector to direct emergency procedures which could result from fires, explosions or releases of PCB containing wastes at the facility. LANL shall submit the name of this inspector within sixty (60) days of the effective date of this approval. LANL shall maintain in good working order any equipment required to deal with these emergencies.

M. Spills:

PCB spills occurring at the disposal site or from any LANL owned PCB transport vehicle, shall be cleaned up according to the PCB Spill Cleanup Policy, 40 CFR Part 761, Subpart G. PCB spills occurring outside PCB storage areas shall be reported within twenty-four (24) hours of the event to the EPA Region 6, PCB Spill Coordinator, Toxics Enforcement Section. The EPA may order cessation of PCB disposal at LANL if spills are not cleaned up to acceptable levels defined by EPA.

N. Duty to Notify:

LANL shall notify the EPA Region 6, OK/TX RCRA Permits

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Section, in writing at least thirty (30) days prior to any planned physical or operational change that may require modification of this approval.

O. Effective Date:

The approval shall become effective on the date of the approval letter, and expire at midnight the same month and day after five years.

END OF APPROVAL CONDITIONS