State of New Mexico
ENVIRONMENT DEPARTMENT
DOE OVERSIGHT BUREAU
P.O. Box 1663, MS/J-993
Los Alamos, New Mexico 87545

NPDES

GARY JOHNSON
GOVERNOR

MARK E. WEIDLER
SECRETARY

17 February 1998

Mr. Mat Johansen, AIP POC
U.S. Department of Energy
Los Alamos Area Office
528 35th Street, MS A316
Los Alamos, NM 87544

LANL/Ron-HSWA/NPDES

RE: Department of Energy Oversight Bureau (DOE OB) Inspection Observations and Recommendations concerning NPDES outfalls scheduled for deletion through the Waste Stream Characterization Program at Los Alamos National Laboratory (LANL).

Dear Mr. Johansen:

The following NPDES outfalls are to be scheduled for deletion from LANL's NPDES permit through the Waste Stream Characterization Program. DOE OB and LANL ESH-18 staff completed non-regulatory inspections of these outfalls on the indicated dates and concur that they are no longer in use, with the exception of EPA Outfall #02A007, which is still being used for storm water discharges. DOE OB observations and recommendations for each outfall are listed on the following attachment. This inspection was requested by ESH-18 and a copy of this correspondence will be transmitted to the ESH-18 Group Leader.

If you have any questions please do not hesitate to call Dennis Romero, of our staff, at 672-0459.

Sincerely,

Stephen Yanicak

Steve Yanicak, LANL POC
Department of Energy Oversight Bureau

RECEIVED
FEB 17 1998
DOE OVERSIGHT BUREAU

SY:dr

cc w/o attachments:

John Parker, NMED, Chief, DOE OB

15682

cc w/attachments:

Stu Dinwiddie, NMED, Program Manager, HRMB
Glen Saums, NMED, Program Manager, SWQB
Barbara Hoditscheck, NMED, SWQB
Ralph Ford-Schmid, NMED, DOE OB
Joe Mose, DOE LAAO, ER Remedial Action Group, MS A316
Bonnie Koch, DOE LAAO, ER Canyons Investigations Group, MS A316
Roy Michelotti, LANL, ER Remedial Action Group, CST-7, MS E525
Allyn Pratt, LANL, ER Canyons Investigations Group, MS J521
Steve Rae, LANL, Group Leader, ESH-18, MS K497
Michael Saladen, ESH-18, MS K497
Tina Sandoval, ESH-18, MS K497
Michael Alexander, ESH-18, MS K497

c:\...\npdsdel6.wpd (lttr. 2-17-98)

DOE OB Inspection Observations and Recommendations

OUTFALL: 06A079

LOCATION: Building TA-40-4

DATE OF INSPECTION: 2-12-98

DELETION METHOD: Building 40-4 was remodeled, and the old photo chamber has been replaced with a recirculating photo chamber which will not produce any discharges. All internal drains to the outfall have been plugged. The outfall pipe has been capped with concrete.

OUTFALL STATUS: Outfall no longer in use.

RECOMMENDATION: The DOE OB recommends that this outfall be taken off the NPDES industrial permit. In addition, we recommend the following concerns be addressed: This photo-processing outfall was never listed as a PRS in the RFI Work Plan for OU-1111. Because this outfall may be a PRS, we recommend that the pipe and the drainage area immediately below the outfall be investigated through AP 4.5 for possible inclusion in LANL's HSWA permit.

OUTFALL: 06A080

LOCATION: Building TA-40-5

DATE OF INSPECTION: 2-12-98

DELETION METHOD: Building 40-5 was remodeled, and the old photo chamber has been replaced with a recirculating photo chamber which will not produce any discharges. There are no floor drains inside the building. All discharge sources to the outfall pipe have been capped. The outfall pipe has been capped with concrete.

OUTFALL STATUS: Outfall no longer in use.

RECOMMENDATION: The DOE OB recommends that this outfall be taken off the NPDES industrial permit. In addition, we recommend the follwoing concerns be addressed: This photo-processing outfall was never listed as a PRS in the RFI Work Plan for OU-1111. Because this outfall may be a PRS, we recommend that the pipe and the drainage area immediately below the outfall

be investigated through AP 4.5 for possible inclusion in LANL's HSWA permit..

OUTFALL: 06A081

LOCATION: Building TA-40-8

DATE OF INSPECTION: 2-12-98

DELETION METHOD: Building 40-8 was remodeled, and the old photo chamber has been replaced with a recirculating photo chamber which will not produce any discharges. The floor drains inside the building have been plugged. There are no water sources remaining inside the building. The outfall pipe has been capped with concrete.

OUTFALL STATUS: Outfall no longer in use.

RECOMMENDATION: The DOE OB recommends that this outfall be taken off the NPDES industrial permit. In addition, we recommend the following concerns be addressed: This photo-processing outfall was never listed as a PRS in the RFI Work Plan for OU-1111. Because this outfall may be a PRS, we recommend that the pipe and the drainage area immediately below the outfall be investigated through AP 4.5 for possible inclusion in LANL's HSWA permit..

OUTFALL: 06A100

LOCATION: Building TA-40-15

DATE OF INSPECTION: 2-12-97

DELETION METHOD: Building 40-15 was remodeled, and the old photo chamber has been replaced with a recirculating photo chamber which will not produce any discharges. There are no water sources remaining inside the building. The outfall pipe has been capped with concrete.

OUTFALL STATUS: Outfall no longer in use.

RECOMMENDATION: The DOE OB recommends that this outfall be taken off the NPDES industrial permit. In addition, we recommend the following concerns be addressed: This photo-processing outfall was never listed as a PRS in the RFI Work Plan for OU-1111. Because this outfall may be a PRS, we

recommend that the pipe and the drainage area immediately below the outfall be investigated through AP 4.5 for possible inclusion in LANL's HSW permit.

OUTFALL: 02A007

LOCATION: Building TA-16-540

DATE OF INSPECTION: 2-12-98

DELETION METHOD: The facility was used as a steam plant. All boilers and their associated drains have been taken out of service. All floor drains have been plugged. The pipe which carried the treated sources to the outfall has been capped with a blank flange. The outfall will continue to receive storm water from drains located on the roof of the facility.

OUTFALL STATUS: Continued use only during storm water events.

RECOMMENDATION: The DOE OB recommends that this outfall be taken off the NPDES industrial permit. In addition, we recommend the following concerns be addressed: The outfall is upgradient of PRS 16-001 (b) and slightly downgradient of PRS 16-001 (a) and (c). Storm water discharges may cause the migration of boiler water treatment agents (low levels of copper, iron, phosphate, and chromate) which could have accumulated due to the discharge of treated boiler water during the steam plant's lifetime. During the life of the plant, small amounts of solvents and oils may have passed through the floor drains; these solvents may have accumulated in the area, and discharges of storm water over this area may cause migration to occur. Because the area around the outfall may show the potential for pollutant migration from PRSs 16-001 (a), (b), and (c), we recommend that the pipe and the drainage area immediately below the outfall be investigated through AP 4.5. If the investigation determines that a migration of pollutants could occur as a result of storm water discharges, the outfall pipe could be extended outside the area to prevent this from occurring.

OUTFALL: 04A184

LOCATION: Building TA-21-1003

DATE OF INSPECTION: 2-12-98

DELETION METHOD: Back-Flow Prevention system has been serviced and will be

maintained by certified technicians. A small discharge, on the order of approximately 1 gallon per month, will continue as a result of surges in county's potable water system. The discharge consists solely of potable water. Ownership of this facility will be transferred to the county within the next four years.

OUTFALL STATUS: Still in use to accommodate the operation of the BFP system, but not significant enough to be included on NPDES permit.

RECOMMENDATION: The DOE OB recommends that this outfall be taken off the NPDES industrial permit. This outfall will continue to discharge an extremely small amount of potable water due to pressure build-up in the municipal water distribution system. This outfall does not discharge to any known PRSs immediately below or down-gradient of the pipe. The erosion potential from this outfall is minimal. LANL plans on filing a general Notice of Intent (NOI) to discharge from this site.