

Stephanie ✓ SJK



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



GARY JOHNSON
GOVERNOR

MARK E. WEIDLER
SECRETARY

itswA LANL G/M/SW/98 Permit

March 23, 1998

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

RE: 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 exceptions of EPA Outfalls 04A153 and 03A045, which are still being used for storm water discharges. DOE OB observations and recommendations for each outfall are listed on the 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,

Steve Yanicak, LANL POC
Department of Energy Oversight Bureau

SY:dr

cc w/o attachments:

John Parker, NMED, Chief, DOE OB

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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

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DOE OB Inspection List of Observations and Recommendations

OUTFALL: 03A025

LOCATION: Building TA-3-208

DATE OF INSPECTION: 3-20-98

DELETION METHOD: Building 3-208 is a candidate for decontamination and decommissioning. The cooling water tower and basin were drained and cleaned. The cooling tower outlet has been capped. Mechanical equipment is scheduled for lockout/tagout by the facility manager. There are three drains inside the building which are tied into the outfall. One of the drains has been sealed. Two drains remain open to the outfall due to operational concerns (fire suppression system is still online). The two drains will be collared to minimize any possible flow to the outfall. There is a break in the outfall pipe approximately 5 ft from the outfall. The facility did use/store small amounts of tritium during its operational lifetime.

OUTFALL STATUS: The fire suppression system would cause a discharge to the outfall if set off.

RECOMMENDATION: The DOE OB recommends that this outfall not be taken off the NPDES industrial permit, until the following concerns have been addressed: (1) the equipment inside the building be tagged/locked out; (2) the fire suppression system be taken offline; and (3) all the drains are sealed. In addition, we recommend the following concerns be addressed (these concerns will not affect outfall deletion): This outfall was never listed as a PRS in the RFI Work Plan for OU-1114. Because there is a slight possibility that 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: 04A153

LOCATION: Building TA-48-1

DATE OF INSPECTION: 3-20-98

DELETION METHOD: All sources to outfall, with the exception of storm water drains have been either plugged or rerouted to sanitary sewer lines. However, there is a history of discharge into the storm drains from a malfunctioning vacuum pump located on the roof of Bulding 48-1. The pump has been repaired and is no longer discharging to the outfall. When the pump did discharge to the

outfall, it did so at a flow rate of approximately 0.3 gpm. This outfall does feed a wetland which is classified as a PRS (PRS 48-010).

OUTFALL STATUS: Continued use only during storm water events (1/3 of storm water drains from Building 48-1 drain into this outfall).

RECOMMENDATION: The DOE OB recommends that this outfall not be taken off the NPDES industrial permit until the following concerns have been addressed: (1) the vacuum pump should have some type of secondary container, perhaps a collar, which surrounds it; and (2) some type of maintenance schedule should be established to verify that the pump is not leaking and discharging into the outfall.

OUTFALL: 03A045

LOCATION: Building TA-48-1

DATE OF INSPECTION: 3-20-98

DELETION METHOD: All twenty eight floor drains leading to this outfall were either capped or routed to sanitary sewer lines. Storm water drains from Building 48-1 still feed this outfall. Two drains, BFD1 and BFD6, have not been rerouted. Both drains have collars with covers and a single drain line from backflow preventers, which discharge approximately 50 gpm of water when tripped. Both drains normally remain dry. Drain BCD1 is located in an electrical room and is still open to the outfall, due to operational safety concerns. BCD1 does not have any direct sources and is normally dry. This outfall also feeds a small wetlands (PRS 48-010).

OUTFALL STATUS: Continued use only during storm water events (2/3 of storm water drains from Building 48-1 drain into this outfall).

RECOMMENDATION: The DOE OB recommends that this outfall not be taken off the NPDES industrial permit until the following concerns be addressed: (1) some type of maintenance schedule should be established for Drains BFD1 and BFD6 to ensure that the caps remain in place and that the BFPs they service have not been set off; and (2) some type of maintenance schedule be developed for BCD1 to ensure that it has not received any discharge from the electrical room.

OUTFALL: 04A143

LOCATION: Building TA-15-306

DATE OF INSPECTION: 3-20-98

DELETION METHOD: As of 3-4-98, a closed loop recirculating chiller unit has been installed at 15-306. This replaces the old unit which discharged to the outfall. There are no further sources to the outfall. The PVC outfall piping is being removed.

OUTFALL STATUS: Outfall no longer in use.

RECOMMENDATION: The DOE OB recommends that this outfall be taken off the NPDES industrial permit. The outfall and its associated piping were not located near a PRS. The only discharge that the outfall received was distilled water. No further action for this outfall is necessary.

OUTFALL: 05A069

LOCATION: Building TA-11-50

DATE OF INSPECTION: 2-20-98

DELETION METHOD: The facility was used as a drop pad for the testing of high explosive devices. The outfall was a treatment sump and its associated piping which received water when the drop pad was washed down following each set of experiments. The piping leading to the outfall has been capped, and the sump has been filled with gravel and capped with a 4-inch concrete pad. A 10-inch concrete berm surrounds the pad. The drains from the washdown are sent to outfall 05A097.

OUTFALL STATUS: Outfall no longer in use.

RECOMMENDATION: The DOE OB recommends that this outfall be taken off the NPDES industrial permit. The outfall is upgradient of PRS 11-006 (b), which is presently under evaluation by AIP 4.5.

OUTFALL: 05A096

LOCATION: Building TA-11-51

DATE OF INSPECTION: 3-20-98

DELETION METHOD: Outfall services same drop pad as 05A069. Outfall consists of four drainage pipes and a sump. The flow from this outfall has been routed to outfall 05A097. The outlet piping has been capped. A 10-inch concrete berm now surrounds the drop pad.

OUTFALL STATUS: Outfall no longer in use.

RECOMMENDATION: The DOE OB recommends that this outfall be taken off the NPDES industrial permit. The outfall was upgradient of PRS 11-002, which is presently under investigation by AIP 4.5.