



TA 16

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
INTERFIRST TWO BUILDING, 1201 ELM STREET
DALLAS, TEXAS 75270

BH
CIC

MAR 19 1986

Mr. Jim White
Los Alamos Laboratory
HSE-8 MSE518
P.O. Box 1663
Los Alamos, New Mexico 87545

Re: Los Alamos Laboratory
NMO890010515

Dear Mr. White:

This letter is in response to your telephone conversation with Rosemary Martinez of my staff on February 20, 1986. Enclosed is a copy of the inspection report completed by Region 6 during its lead inspection at Los Alamos Laboratory during January 27-28, 1986. Also enclosed is the memorandum on "U.S. Army Procedures to Determine Reactivity".

As agreed in the telephone conversation, you will compare the test methods used on the effluent from the High Explosive (HE) sand and gravel beds in the Technical Area 16 (TA-16) Thermal Treatment Facility with the test methods for explosive wastes in the memorandum and submit conclusions to EPA. Please include a description of your test methods and analytical results from these tests and a description of each waste stream to the HE sand and gravel beds.

If you have any questions, please feel free to contact me at FTS 729-9730 or Rosemary Martinez at 729-0587.

Sincerely yours,

William H. Taylor, Jr., Chief
Enforcement Section (6H-CE)

Enclosure

cc: Peter Pache, Manager
Hazardous Waste Section
New Mexico Health and Environmental Department

RECEIVED
MAY 20 1986
HAZARDOUS WASTE SECTION



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INSPECTION REPORT:

Facility: Los Alamos National Laboratory
Facility ID #: NM 0890010515
Inspection Date: January 27, 1986
Inspectors: Jack Ellvinger, NMEID
Kelley Crossman, NMEID
Ann Claassen, NMEID
Michael Michaud, U.S. EPA
Lonnie Ross, U.S. EPA
Prakash Dave, U.S. EPA

INTRODUCTION:

The annual inspection of LANL was conducted on 1/27 + 28/86. The inspection was preceded by an in-briefing (see attached list for participants). At the in-briefing the protocol of the inspection was explained. EPA was to conduct the inspection (lead) while the State conducted a joint inspection. There was also to be an evaluation of LANL's ground water monitoring/waiver documentation.

It was explained that a facility tour would precede the paperwork portion of the inspection. The tour was to include all areas of the facility that conducted treatment, storage, disposal activities involving hazardous waste. Additionally, it would be necessary to view several collection points. It was imperative that Areas P, L, G, and TA102 be inspected. Each of these areas have actions pending, i.e. closure, change under interim status, past enforcement action.

Review of LANL's inspection program as-well-as their personnel training program were also priority items for this inspection. Both of these items were past NOV and CO violations. The inspection program was found to be in violation of the CO at the time of last years' inspection.

TOUR:

The inspection team split up with Kelley Crossman, Jack Ellvinger, Michael Michaud and Lonnie Ross moving to conduct the facility inspection and the appropriate paper work and Ann Claassen and Prakash Dave moving to inspect ground water documentation and monitoring installations.

The inspectors first met with Pat Smith and reviewed the training records. These consisted of the training program outline and documentation of who has taken training. Ms. Smith's presentation was impressive. It was obvious that this aspect of LANL's Hazardous Waste Program has been greatly improved. Ms. Smith made a point that the training program was still in its genesis. LANL is constantly reviewing new programs and material in an effort to improve their existing program.

TA-16

The inspectors reviewed the operations at Areas L, G, and P. These are all land disposal operations which LANL is seeking to close.

Area G is still being used for the disposal of "mixed waste". RCRA has not been buried here since May, 1985. The operation is unchanged. Disposal is in cells in deep pits, locations are pin pointed by using three different reference points.

Area L is no longer being used for burial of hazardous waste. Burial was discontinued prior to 11/8/85. This area is being used for storage of drums, treatment of lithium hydrid contaminated with radioactivity in above ground tanks, and two, no longer used, surface impoundments. The above ground tanks have replaced the surface impoundments. The storage area is being increased in size under Part III of HWMR-2, changes under interim status. A large pad has been poured. Provisions for seperate bays, gutters and containment as well as protection from the weather is being provided (a roof). Once completed this will replace the current pallet-on-ground storage that is currently being utilized.

The signs on the fence surrounding Area L were all in English except for the one on the entrance gate. That was in both English and Spanish. There are still some shaft markers that do not have the dates of operation stamped on them.

Area P has had some preliminary work done to better understand what closure activities will be necessary. Disposal at this site also ceased in May, 1985. Nearby the land disposal operation are sand filters and a surface impoundment which receives the waste water from the filters. HE waste mixed with water is pumped from sumps and subsequently treated by heating to induce evaporation. The barium waste remaining is then removed and drummed for disposal. The water with whatever contaminates are carried with it is transported via pipe to a lined surface impoundment. The discharge from that impoundment is governed by a NPDES Permit and therefore permitted by rule under HWMR-2. The question arose, is the surface impoundment regulated under RCRA/HWMR-2? If it is, LANL has up to twenty-five more similar operations which would then come in to the system. Calls to EPA Dallas and EPA Headquarters/Washington seem to initially indicate that they will be in the system.

INSPECTION CHECKLISTS AND FINDINGS:

The inspectors completed the following checklists:

- 1) Generator
- 2) Treatment, Storage, Disposal
- 3) Surface Impoundments
- 4) Tanks (2)
- 5) Container Storage
- 6) Closure Areas
- 7) Post-Closure
- 8) Landfills
- 9) Thermal Treatment

OUT-BRIEFING-FINDINGS:

An out-briefing was held for all parties concerned. A list of attendees is attached. At the out-briefing, the following points were discussed:

- 1) Under LANL's Waste Analysis Plan there are provisions to test a certain percentage of bottles and vials. This has been mutually agreed to be EID and LANL.
- 2) Personnel Training has not been fully implemented. Under EID CO of May, 1985, LANL was not tasked to have this program completely on line until 5/86. Part of the program is in place with a course in emergency procedures to be presented in 3/86 and spill response and contingencies due 2/86.
- 3) The main point of contention centered around the previously mentioned issue of whether the surface impoundments whose discharge is regulated by NPDES are governed by RCRA/HWMR-2. If they are, LANL indicated they would have to research their legal options on the issue.
- 4) The report on the groundwater monitoring issue was noncommittal from EPA. Since that time, EID has received a letter from EPA Region VI concurring with EID that LANL has sufficient evidence to indicate that there is low potential for the migration of Hazardous Wastes to the groundwater therefore justifying the waiver.