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M E M O R A N D U M

TO: Kathleen Sisneros, Chief  
Surface Water Quality Bureau

THRU: Glenn Saums, Program Manager  
Surface Water Section

FROM: John Gould, Environmental Supervisor  
Hazardous Waste Section

SUBJECT: UNPERMITTED DISCHARGE AT LANL

DATE: August 17, 1988

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On 8/6-12/88, I accompanied Mike Michaud of EPA on a hazardous waste Compliance Evaluation Inspection at Los Alamos National Labs. We were informed that a waste oil surface impoundment constructed in the late 70's at TA-85, Building 125, had been removed from service several months ago due to the discovery of regulated solvents in the oil. The solvents detected were listed hazardous wastes and resulted in the entire contents of the impoundment being considered a hazardous waste; this liquid was pumped from the impoundment, drummed and stored prior to off-site disposal.

On visiting the site, I observed a cup-shaped impoundment, lined with concrete, approximately 20 feet across and 10 feet deep. The impoundment was located on the north rim of Ten Site Canyon and was constructed with a spillway which appeared to allow discharge directly to the canyon (the impoundment had been pumped dry but contained approximately 2 feet of what was reported to be rainwater). The impoundment also displayed a dark, oil-appearing "bathtub ring", the top of which came to the bottom of the spillway.

On closer examination, I observed that the spillway had discharged and noted an oily coating on the rocks below the spillway approximately eight feet wide and extending as far down into the canyon as I could see.

JG/aw



5035

VOA ANALYTICAL DATA FOR THE OIL PITS AT TA-35 TSL-125 AND TSL-85.

TSL-125 (SLUDGE)

2-Butanone	48.1	+/-	4.8	ppb	
1,1,1-TCA	151.2	+/-	15.1	ppb	
4-Methyl-2-Pentanone	20.0	+/-	20.0	ppb	
2-Hexanone	35.3	+/-	3.5	ppb	
Tetrachloroethene	89.4	+/-	8.9	ppb	
Xylenes	153.9	+/-	40.9	ppb	(total)
Acetone	< 200.0	+/-		ppb	(TIC)
1,2,2-Trifluoroethane	?			ppm	
Methylene Chloride	> MDL				(TIC)

TSL-125 (WATER)

1,1-Dichloroethane	77.7	+/-	7.8	ppb	(TIC)
1,1,1-Trichloroethane	?			ppm	
Acetone	109.6	+/-	54.8	ppb	
2 unknown Halogenated hydrocarbons.					

TSL-85 (WATER)

Methylene Chloride	> MDL				(TIC)
2-Butanone	> 200.0			ppb	
2-Hexanone	42.9	+/-	4.3	ppb	
Acetone	?			ppm	
1,2,2-Trifluoroethane	> 200.0			ppb	

TSL-85 (SLUDGE)

Methylene Chloride	> MDL				(TIC)
2-Butanone	> 200.0			ppb	
2-Hexanone	42.8	+/-	4.3	ppb	
Acetone	?			ppm	
1,2,2-Trifluoroethane	?			ppm	

(TIC) = Tentatively Identified Compound. (80% confidence)