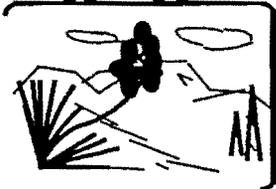


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John

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ENVIRONMENT

DEPARTMENT

STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION

1190 St. Francis Drive, Santa Fe, New Mexico 87503

(505) 827-2805

GARREY CARRUTHERS
Governor

CARLA L. MUTH
Secretary

MICHAEL BURKHART
Deputy Secretary

September 8, 1988

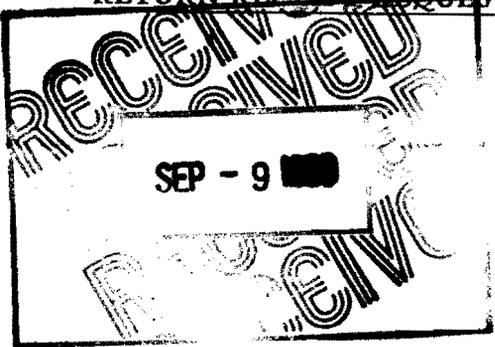
Mr. Harold E. Valencia
Area Manager
U.S. Department of Energy
Los Alamos Area Office
Los Alamos, New Mexico 87544

Attn: Mr. Charles Nylander

RE: Unpermitted discharge

Dear Mr. Valencia:

CERTIFIED MAIL NO. P-484 097 767
RETURN RECEIPT REQUESTED



On August 8-12, 1988 Mr. John Gould, EID-Hazardous Waste Section, and Mr. Mike Michaud, USEPA, conducted a hazardous waste Compliance Evaluation Inspection at Los Alamos National Laboratory (LANL). They were informed that a waste oil surface impoundment had been constructed in the late 1970's at TA-35, Building 125, and that it was taken off line because of the discovery of regulated solvents in the oil. The solvents detected were listed hazardous wastes. During the inspection, it was observed that the cup-shaped impoundment, located on the north rim of Ten Site Canyon, was constructed with a spillway which appeared to allow discharge directly into the canyon. The impoundment also displayed a dark, oil-like "bathtub ring", the top of which came to the bottom of the spillway. Upon closer examination, the inspectors observed signs that the spillway had discharged, noting an oily coating on the rocks below the spillway, extending as far down as could be seen by the inspectors. Information on the unpermitted discharge has been submitted to the USEPA for their review.

On August 16, 1988, I spoke with Mr. Charles Nylander (LANL) about the above mentioned discharge. Mr. Nylander stated that discharges had occurred from the containment pond prior to the discovery of the hazardous waste constituents, and that the discharges contained spent mineral oil from the Laser Facility and natural precipitation. According to Mr. Nylander, the containment pond is used to catch spills from Building 125 at TA-35, and the containment pond is designed to fully contain any discharge from this facility. Mr. Nylander stated that LANL's opinion was that the containment pond is not NPDES permitted because discharges are handled under LANL's SPCC plan and EPA is always notified if a spill occurred. The state was never notified because LANL

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Mr. Harold E. Valencia
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had run analyses on all discharges, and LANL had determined that the discharges were not detrimental to human health and discharges were not to any watercourse.

Pursuant to Section 74-6-9, B., NMSA 1978, I have requested records of all previous discharges and the sampling results from the spills. Please submit the records and sampling results requested on August 16, 1988 within 7 days upon receipt of this letter.

If you have any questions, do not hesitate to call. I can be reached at 827-2798.

Sincerely,



Mike Saladen
Water Resource Specialist
Surface Water Section

MS:ms

xc: Bob Hiller, USEPA (6W-ET)
Court Voorhees, District II Office
Tracy Hughes, Office of General Counsel, HED
John Gould, Hazardous Waste Bureau