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Department of Energy
Field Office, Albuquerque
Los Alamos Area Office
Los Alamos, New Mexico 87544
AUG 30 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Coby Muckelroy
Hazardous and Radioactive Waste Bureau
New Mexico Environment Department
525 Camino de los Marquez, Suite #4
P. O. Box 26110
Santa Fe, New Mexico 87502



Dear Mr. Muckelroy:

Subject: Hazardous Waste Disposal Incident

The purpose of this letter is to discuss the inadvertent disposal of hazardous waste into the Los Alamos County (LAC) landfill by the Los Alamos National Laboratory (LANL). The information contained in this letter was requested by you during your telephone conversation with Jeff Carmichael of LANL on June 19, 1995.

On June 8, 1995, a post doctorate researcher at LANL's Health Research Laboratory (HRL), located at Technical Area 43 spilled a chemical mixture of waste. The waste was a spent chemical solution used in cellular research (it's waste profile is enclosed for your review). The main components of the solution are n-methylpyrrolidine, methylene chloride, piperidine, and methanol. This spent solvent mixture has Resource Conservation and Recovery Act (RCRA) waste codes of F002 and F003.

The researcher was transferring the solution to a waste bottle when the spill occurred. He has estimated that approximately 200-500 milliliters, approximately one quart, of the solution was spilled. The researcher then used an estimated 50 paper towels to absorb the spill and these were placed in a laboratory trash can. He then cleaned the floor using a custodial mop to remove any remaining residue. The mop and waste water were returned to the custodial closet, but not emptied to any drain. The mop and rinse water associated with the spill clean-up have since been containerized, properly labeled, and placed in a hazardous waste satellite storage area. The absorbed solution on the paper towels placed in the laboratory trash can was bagged by janitors and placed into a solid waste dumpster for disposal sometime after June 8, 1995. The solid waste dumpster was taken to the LAC landfill on June 12, 1995.

The spill occurred after normal working hours on Thursday evening. The researcher did not follow procedures for spill notification and cleanup and did not report the spill to HRL personnel until the morning of Tuesday, June 13, 1995. After a brief internal investigation by the HRL Facility Manager on June 13, LANL's Occurrence Investigation Group (ESH-7) was notified of



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the spill late on June 13. On June 14, 1995, LANL staff met to assess the incident and determine action needed.

On June 14, 1995, at 4:10 p.m., Mike Tomlinson, Manager, LAC landfill, was notified of the inadvertent disposal of hazardous waste into the landfill. The disposal cell that received the HRL waste was immediately isolated and solid waste disposal into the cell was stopped. On June 15, 1995, Mr. Tomlinson notified David Duran of NMED's Solid Waste Bureau. During the notification, Mr. Duran requested that LANL notify the Hazardous and Radioactive Materials Bureau regarding the disposal of this waste material into the Los Alamos County Landfill. On June 16, 1995, Mr. Carmichael of LANL's Hazardous and Solid Waste Group contacted Barbara Hoditschek of the Hazardous and Radioactive Materials Bureau regarding the disposal incident.

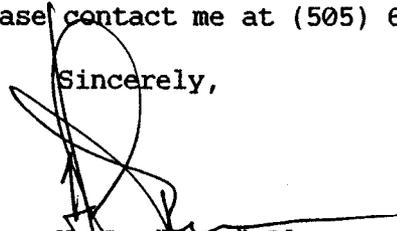
On June 16, 1995, LANL staff met with Mr. Tomlinson to assess the retrievability of the HRL waste from the landfill. After visiting the disposal site, it was determined that the waste was buried in a lift containing an estimated six feet of compacted solid waste and one foot of soil cover. Based on this information, the group came to a consensus that the waste was not retrievable.

LANL believes that there is no threat to human health and the environment from the HRL waste that was deposited in the LAC landfill. The amount of waste deposited was small, estimated at approximately 200-500 milliliters, or one quart, of absorbed liquid. In addition, the depth to groundwater beneath the LAC landfill is approximately 1,200 feet. There are no municipal water wells within one mile of the landfill. Furthermore, the nearest surface water course is in Sandia Canyon, which is approximately 1000 feet south of the disposal cell. The compaction of the solid waste and cover of compacted soil will minimize worker exposure to the waste as it volatilizes. The LAC landfill worker that ran the trash compactor never noticed any solvent odors during compacting of the waste on June 12, 1995.

LANL is investigating why the individual involved in the spill was unaware of his responsibilities. This individual has received training for such events through completion of Hazard Communication Training as indicated on the enclosed record. The procedure for spill notification and cleanup is, however, now being reviewed and will be modified, if required, to prevent future incidents of this nature.

If you have any questions, please contact me at (505) 665-5042.

Sincerely,



H. L. "Vody" Plum

Office of Environment and Projects

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Enclosures

cc:

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