

TA-48



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us



JOHN R. D'ANTONIO, JR.
SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 3, 2002

Dr. John C. Browne, Director
Los Alamos National Laboratory
P.O. Box 1663, Mail Stop A100
Los Alamos, New Mexico 87545

Mr. Everett Trollinger, Project Manager
Department of Energy
Office of Los Alamos Site Operations
528 35th Street, Mail Stop A316
Los Alamos, New Mexico 87544

SUBJECT: RELEASE/DISCHARGE NOTIFICATION
TECHNICAL AREA 48
LOS ALAMOS NATIONAL LABORATORY, NM0890010515
HWB-LANL-01-099

Dear Dr. Browne and Mr. Trollinger:

On August 8, 2002 the New Mexico Environment Department (NMED) was notified by Los Alamos National Laboratory (LANL) of a release of several organic compounds (ethyl- and methyl-benzene compounds and naphthalene) near building TA-48-1 at Technical Area 48. This release was discovered during trenching operations in the area. Based on the proximity of the release to the solid waste management units (SWMUs) 48-002(e) and 48-002(c) and the type of contamination found, it appears that this release may be associated with these SWMUs.

SWMU 48-002(e) was a satellite container storage area located on the east side of TA-48-1. This area was listed on the 1988 Laboratory Active Container Storage Database and was used as a storage area for solvents such as cutting oil. Releases and spills have not been documented at this area; however, stains were observed on the pavement on which drums were formerly stored. 48-002(c) is a container storage area on asphalt between a metal storage shed and the fence on the east side of TA-48-1. Drums, lead pigs, and batteries were stored here from 1988 to 1989. Some drums and cans formerly stored in this area were unlabeled; other drums were labeled as containing chemical waste (unspecified), decontamination waste, and pump oil. The condition of containers was not mentioned, and releases and spills have not been documented at this area



2668

Dr. John C. Browne and M Everett Trollinger
September 3, 2002
Page 2

(RFI Work Plan for OU 1129, May 1992).

NMED does not agree that this is an operational release as there is no information to the contrary. If LANL believes that it is an operational release it shall investigate and provide evidence and/or documentation supporting this belief. Otherwise, it appears that a release from SWMU 48-002(e) or 48-002(c) caused this contamination.

If LANL cannot prove that this is an operational release, LANL shall consider this contamination as either part of SWMU 48-002(e) or 48-002(c) and perform an interim measure to investigate and remediate the contamination. The reason for this interim measure is based on institutional reasons (i.e. routine construction) pursuant to the April 1994 "RCRA Permit Module VIII - Special Conditions Pursuant to the 1984 Hazardous and Solid Waste Amendments to RCRA for Los Alamos National Laboratory, EPA I.D. NM0890010515, Section J - Interim Measures."

LANL shall submit an interim measures workplan or similar documentation to NMED for approval. If you have any questions, please contact Lee Winn at (505) 428-2541.

Sincerely,



John Young
LANL Corrective Action Project Leader
Permits Management Program

JRY:lw

Attachment

cc w/ attachment:

- L. Winn NMED HWB
- J. Davis, NMED SWQB
- J. Parker, NMED DOE OB
- S. Yanicak, NMED DOE OB, MS J993
- L. King, EPA 6PD-N
- J. Vozella, DOE OLASO, MS A316
- M. Kirsch, LANL RRES/ER, MS M992
- D. McInroy, LANL RRES/ER, MS M992
- B. Ramsey, LANL RRES/DO, MS J591
- D. Stavert, LANL RRES/DO, MS J591
- M. Saladen, RRES/WQH, MS K497

file: Reading and HSWA LANL TA 48-002(c) & TA 48-002(e)