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M E M O R A N D U M

TO: Ms. Kathy Sisneros, Chief
Surface Water Bureau

FROM: C. Kelley Crossman *CKC*
Hazardous Waste Program

SUBJECT: **LANL Monitoring**

DATE: May 30, 1989

The enclosed pages from the draft RCRA permit for LANL address monitoring of the surface discharges. If your bureau wishes to comment on this, or any other portion, of the permit, please do so by July 7, 1989, so that I can include your comments in the final draft.

TC



//D. SECURITY

The Permittee shall comply with the security provisions of HWMR-5, Part V, Section 264.14.

//E. INSPECTION REQUIREMENTS

1. Inspection Plan. The Permittee shall follow Permit Attachment B. and the inspection requirements in Modules III through VII. The Permittee shall remedy any deterioration or malfunction of equipment or structure discovered by an inspection as required by HWMR-5, Part V, Section 264.15(c). Inspection logsheets may be revised by the Permittee and submitted to the Director for inclusion in this permit by permit modification in accordance with HWMR-5, Part IX, Section 270.42.
2. Facility Release Inspection.
 - a. The Permittee shall take surface water samples and analyze for metals, volatile and both acid-and-base neutral semivolatile organic hazardous waste constituents in accordance with Table II-2 annually at the sample locations in Table II-1.
 - b. The sampling and analysis shall be done using EPA-approved procedures as published in the latest issue of SW-846.
 - c. Analysis of Variance (ANOVA) statistical procedures as promulgated in 53 FR 39720 (October 11, 1988) shall be used to compare data between up-gradient and down-gradient stations
 - d. Records of this inspection shall be kept in accordance with permit paragraph II.K.1.a. below.
 - e. Reports of releases detected by this inspection shall be made in accordance with permit paragraph II.K.2.c. below.

//F. PERSONNEL TRAINING

The Permittee shall conduct personnel training as required by HWMR-5, Part V, Section 264.16. This training program shall follow Permit Attachment C. Permit Attachment C. shall be updated by the Permittee whenever necessary so as to remain current and accurate. A dated copy of the revised training program will be submitted to the Director for the permit files and permit modification in accordance with HWMR-5, Part IX, Section 270.42 prior to its implementation.

//G. REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee shall comply with the requirements of HWMR-5, Part V, Section 264.17.

TABLE II-1

ENVIRONMENTAL MONITORING LOCATIONS

STATION	N-S Coordinate (LANL Grid)	E-W Coordinate (LANL Grid)
Los Alamos Reservoir	N105	W090
Frijoles	S280	E180
Canada del Buey	N010	E150
Water Canyon at Beta	S090	E090
Acid Weir	N125	E070
Pueblo - 2	N120	E155
Pueblo - 3	N085	E315
DPS - 1	N090	E160
SCS - 2	N060	E140
Pajarito Stream	S180	E410
Ancho Stream	S295	E340
Frijoles Stream	S365	E235
Pajarito Canyon (PCO-3)	S098	E293
LAO-4.5	N065	E270