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GOVERNOR

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PETER MAGGIORE
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 PAUL R. RITZMA
DEPUTY SECRETARY

MEMORANDUM

TO: John Kieling, LANL Permit Supervisor
RCRA Permits Management Section

THROUGH: Debby Brinkerhoff, Program Manager
RCRA Compliance & Technical Assistance Section

FROM: Mark V. Coffman, Hazardous Waste Inspector
RCRA Compliance & Technical Assistance Section

SUBJECT: TA-53-1 Tank & Sump (MPF-1)

DATE: January 18, 2000

At the LANL monthly meeting held on July 22, 1999, an agenda item was brought to this section's attention regarding the above referenced tank and sump that inadvertently received an accidental spill of RCRA regulated wastes at Bldg. # 1, in TA-53. All available documentation was provided regarding this release by LANL environmental personnel and RPMP personnel requested that the RCRA Inspection/Enforcement Section personnel review the material to ensure that the waste storage, transportation, and disposal were conducted properly per regulations.

Per that request, I was assigned this task. I reviewed all provided documentation and summarize the events that occurred according to LANL documentation. The radiochemistry laboratory generated waste waters contaminated with mercury, acetone, lead, carbon disulfide, and methylene chloride, in one instance, and waste waters contaminated with other constituents in at least three other instances over an approximately six year period from 1990 to 1996. In the first two instances where the tank received accidental spills, 1990 and 1993, no storage was conducted; the waste was removed promptly and properly disposed of. LANL environmental personnel added and subsequently deleted the tank/sump to their hazardous waste storage unit inventory/database as a less than 90 day accumulation area with the attached internal forms; this was just subsequent to the third accidental release to the tank in 1996.

There are no regulations restricting the numbers or durations (lifetimes) of hazardous waste storage units not requiring a permit; Therefore facilities may create and dissolve these units as the need arises. This unit was properly identified and recorded as a less than 90 day accumulation area and the waste remained stored in the tank for less than 90 days according to facility records, as indicated above. Therefore, management of this waste appears to have been handled appropriately.



4526

RED TA 53/00

TC

REGISTRATION FORM FOR HAZARDOUS/MIXED WASTE STORAGE AREA

<input checked="" type="radio"/> New Location		<input type="radio"/> Update for Existing Location Site ID # _____	
<input type="radio"/> Q Clearance Required		<input type="radio"/> RMMA RMMA NO. _____	
<input type="radio"/> L Clearance Required		<input type="radio"/> ER PROJECT OU # _____	
TA 53	BLDG Outside MPF-1 Driveway	ROOM	DATE 10-25-96
OTHER LOCATION INFORMATION Tractor Trailer Trucks			
OWNER/OPERATOR/GENERATOR B. Presente	GROUP AOT-FM	MAILSTOP H814	PHONE 76995
<input type="radio"/> Satellite Accumulation Area			
1. What is the distance between the point of generation and the accumulation area? (Explain) _____ _____ _____			
2. What types of hazardous or mixed waste are generated? <input type="radio"/> Solids <input type="radio"/> Liquids <input type="radio"/> Absorbed Liquids			
<input checked="" type="radio"/> < 90 day Storage Area			
1. Do you have the proper communications or alarm systems, fire protection equipment, spill control equipment and decontamination equipment for the types of hazardous waste generated? (Explain) _____ Yes			
2. Does the Inspector have the RCRA Personnel Training? <input checked="" type="radio"/> yes <input type="radio"/> no (Explain) _____			
3. What types of hazardous or mixed waste are generated? <input type="radio"/> Solids <input checked="" type="radio"/> Liquids <input type="radio"/> Absorbed Liquids			
Do you need a sign? <input type="radio"/> yes <input checked="" type="radio"/> no		Do you generate mixed waste? <input type="radio"/> yes <input type="radio"/> no	
WASTE COORDINATOR'S SIGNATURE B. Presente	GROUP AOT-FM	MAILSTOP H814	PHONE 76995
ESH-19 USE ONLY Site ID # 1510		Date entered 10/25/96	

SEE REVERSE SIDE

RETURN TO: GERI RODRIGUEZ, ESH-19, MS K498, FAX NO. 667-5224

Revised July 29, 1995

HAZARDOUS WASTE STORAGE AREA DECOMMISSIONING FORM (DF)

<input type="radio"/> Satellite		Site ID # _____		<input checked="" type="radio"/> < 90 day		Site ID # <u>6510</u>	
TA	BLDG	ROOM	DATE				
<u>53</u>	<u>MPF-1</u>	<u>Outside D-Wing</u>	<u>11/19/96</u>				
OTHER LOCATION INFORMATION <u>Truck Trailer</u>							
CONTACT		GROUP	MAILSTOP	PHONE			
<u>Blessent</u>		<u>ADT FM</u>	<u>4814</u>	<u>76995</u>			
WERE ALL HAZARDOUS WASTE SPILLS OR RELEASES CLEANED UP AND THE RESULTING MATERIAL HANDLED APPROPRIATELY?							
<input type="radio"/> YES <u>N/A</u> <input type="radio"/> NO							
WAS ALL HAZARDOUS AND MIXED WASTE BEEN PROPERLY DISPOSED OF AND DOCUMENTED?							
<input checked="" type="radio"/> YES <input type="radio"/> NO							
DATE WHEN WASTE WAS DISPOSED OF <u>11/19/96</u>							
WPF # <u>24494</u>							
WASTE COORDINATOR'S SIGNATURE		GROUP	MAILSTOP	PHONE	DATE		
<u>Blessent</u>		<u>ADT FM</u>	<u>4814</u>	<u>76995</u>	<u>11/19/96</u>		
DATE REMOVED FROM DATABASE BY ESH-19 <u>11/20/96</u>							

RETURN TO: GERI RODRIGUEZ or MICHELLE CASH, ESH-19, MS K498

REMINDER:

BEFORE DECOMMISSIONING A HAZARDOUS WASTE STORAGE AREA YOU MUST:

- ENSURE ALL HAZARDOUS WASTE SPILLS OR RELEASES HAVE BEEN CLEANED UP AND THE RESULTING MATERIAL HANDLED APPROPRIATELY.
- ENSURE THAT ALL HAZARDOUS AND MIXED WASTE HAS BEEN PROPERLY DISPOSED OF AND DOCUMENTED.

If you have any questions please call Geri Rodriguez, 7-6259 or Michelle Cash, 5-0223.

75-224

REGISTRATION FORM FOR HAZARDOUS/MIXED WASTE STORAGE AREA

New Location Update for Existing Location
 Site ID # _____

Q Clearance Required RMMA ER PROJECT
 L Clearance Required RMMA NO. _____ OU # _____

TA 53	BLDG 1	ROOM Basement	DATE 4-29-96
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OTHER LOCATION INFORMATION
Located at north end of room in an underground tank.

OWNER/OPERATOR/GENERATOR <i>Rich Rydex</i>	GROUP <i>AOT-FM</i>	MAILSTOP <i>H814</i>	PHONE <i>7-1580</i>
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Satellite Accumulation Area

1. What is the distance between the point of generation and the accumulation area? (Explain) _____

2. What types of hazardous or mixed waste are generated? Solids Liquids Absorbed Liquids

< 90 day Storage Area

1. Do you have the proper communications or alarm systems, fire protection equipment, spill control equipment and decontamination equipment for the types of hazardous waste generated? (Explain) _____

Fire Extinguisher is located outside entrance to room. Waste is contained in underground tank. Waste consists of water with cadmium in it and is low-level rad.

2. Does the Inspector have the RCRA Personnel Training? yes no (Explain) _____

3. What types of hazardous or mixed waste are generated? Solids Liquids Absorbed Liquids

Do you need a sign? yes no Do you generate mixed waste? yes no

WASTE COORDINATOR'S SIGNATURE <i>Bernadette Pesenti</i>	GROUP <i>AOT-FM</i>	MAILSTOP <i>H814</i>	PHONE <i>7-6995</i>	DATE <i>4-29-96</i>
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ESH-19 USE ONLY
 Site ID # 1451 Date entered 4/30/96

RETURN TO: Post-It® Fax Note 7671

Date	<i>4/29/96</i>	# of pages	<i>3</i>
To	<i>Hew</i>		
From	<i>Bernadette</i>		
Co./Dept.	<i>ESH 19</i>		
Phone #	<i>76257</i>	Phone #	<i>76995</i>
Fax #	<i>75224</i>	Fax #	<i>75224</i>

HAZARDOUS WASTE STORAGE AREA

DECOMMISSIONING FORM (DF)

<input type="radio"/> Satellite		Site ID # _____	<input checked="" type="radio"/> < 90 day		Site ID # <u>1451</u>
TA <u>53</u>	BLDG <u>1</u>	ROOM <u>D 100</u>	DATE <u>11/14/96</u>		
OTHER LOCATION INFORMATION <u>Subterranean tank at North End of Room</u>					
CONTACT <u>B. Presente</u>	GROUP <u>AOT-FM</u>	MAILSTOP <u>H814</u>	PHONE <u>7-6995</u>		
WERE ALL HAZARDOUS WASTE SPILLS OR RELEASES CLEANED UP AND THE RESULTING MATERIAL HANDLED APPROPRIATELY? <u>N/A</u> <input type="radio"/> YES <input type="radio"/> NO					
WAS ALL HAZARDOUS AND MIXED WASTE BEEN PROPERLY DISPOSED OF AND DOCUMENTED? <input checked="" type="radio"/> YES <input type="radio"/> NO DATE WHEN WASTE WAS DISPOSED OF WPF # <u>24494, 23784, 23785, 24883, 24884</u> <u>transferred to < 90 day # 1510 for transport to TA-54 and to happen on 11/12/96</u>					
WASTE COORDINATOR'S SIGNATURE <u>B. Presente</u>	GROUP <u>AOT-FM</u>	MAILSTOP <u>H814</u>	PHONE <u>76995</u>	DATE <u>11/14/96</u>	
DATE REMOVED FROM DATABASE BY ESH-19 <u>11/14/96</u>					

RETURN TO: GERI RODRIGUEZ or MICHELLE CASH, ESH-19, MS K498

REMINDER:

BEFORE DECOMMISSIONING A HAZARDOUS WASTE STORAGE AREA YOU MUST:

- ◆ ENSURE ALL HAZARDOUS WASTE SPILLS OR RELEASES HAVE BEEN CLEANED UP AND THE RESULTING MATERIAL HANDLED APPROPRIATELY.
- ◆ ENSURE THAT ALL HAZARDOUS AND MIXED WASTE HAS BEEN PROPERLY DISPOSED OF AND DOCUMENTED.

If you have any questions please call Geri Rodriguez, 7-6259 or Michelle Cash, 5-0223.

< 90 DAY STORAGE AREA SITE SPECIFIC PLAN

Sits ID # _____	TA 53	BLDG 1	ROOM Basement	Waste Management Coordinator Bernadette Pesenti
CONTACT Rich Ryder		GROUP AOT-FM	MAILSTOP H814	PHONE 7-1580

LIST EMERGENCY EQUIPMENT AND LOCATION (or attach copy): (INCLUDE DISTANCE) _____

Fire Extinguisher Located outside entrance door

LIST SPILL CONTROL AND LOCATION (or attach copy): (INCLUDE DISTANCE) _____

Water is contained in underground tank

THERE PROPER COMMUNICATION AT THE SITE? (INCLUDE DISTANCE) _____

- Permanent telephone at site
- Cellular Phone
- 2-Way Radio
- N/A (EXPLAIN) *Two man rule applies when inspections take place*

IS THERE PROPER DECONTAMINATION EQUIPMENT?

- Eyewash
Volume _____
Distance _____
How long can it flow _____
- Safety Shower
Volume _____
Distance _____
- Hose Bib (adequate water supply)
Distance _____
(NOTE: Must be capable of activation at all times when area is in operation)
- N/A (EXPLAIN) *Per discussions with ESH-19, the above should not be necessary.*

EXPLAIN EVACUATION PROCEDURES (or attach copy): _____

Door exit is at south end of room. Stairway to first floor is 20 feet past the door and to the left. Congregate in parking lot to the west of the building.

NOTE: BEST MANAGEMENT PRACTICE "EQUIPMENT SHOULD BE NO MORE THAN 100 FEET FROM STORAGE AREA."

COMMENTS:

SKETCH OF STORAGE AREA:

