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**Environment, Safety, Health Directorate**  
**Environmental Protection & Compliance Division**  
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**Quality Procedure**

## TA-54, Area G PCB Compliance Monitoring

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<b>TA-54, Area G PCB Compliance Monitoring</b>	No. EPC-CP-QP-205	Page 2 of 6
	Revision: 0	Effective Date: 07/14/2016

### History of Revisions

<b>Document Number</b> <i>[Include revision number, beginning with Revision 0]</i>	<b>Effective Date</b> <i>[Document Control Coordinator inserts effective date]</i>	<b>Description of Changes</b> <i>[List specific changes made since the previous revision]</i>
0	10/02	New Document.
1	10/03	Revisions including new record information
2	05/05	Revisions reflect new group name
3	11/06	Annual review; changes to reflect reorganization
4	02/08	Annual review and revision.
4	03/09	Reviewed—no changes necessary.
5	01/11	Biennial review and revision
6	06/13	Biennial review and revision, added references.
EPC-CP-QP-205 R00	07/2016	This document supersedes and replaces the former document WM-PROG-QP-205.6. Procedure transferred to EPC-CP from Waste Management. Changed document number and organization name in document to reflect organizational changes.

<b>TA-54, Area G PCB Compliance Monitoring</b>	No. EPC-CP-QP-205	Page 3 of 6
	Revision: 0	Effective Date: 07/14/2016

## Table of Contents

<b>QUALITY PROCEDURE .....</b>	<b>1</b>
<b>1.0 INTRODUCTION .....</b>	<b>4</b>
1.1 Purpose.....	4
1.2 Scope .....	4
1.3 Applicability.....	4
<b>2.0 PRECAUTIONS AND LIMITATIONS .....</b>	<b>4</b>
2.1 Prerequisites.....	4
<b>3.0 RESPONSIBILITIES .....</b>	<b>4</b>
<b>4.0 WORK PROCESS DESCRIPTION .....</b>	<b>4</b>
4.1 R-57 Monitoring .....	4
4.2 Storm Water Monitoring.....	5
4.3 Reporting Requirements .....	5
<b>5.0 TRAINING .....</b>	<b>5</b>
<b>6.0 DEFINITIONS AND ACRONYMS.....</b>	<b>5</b>
<b>7.0 RECORDS.....</b>	<b>6</b>
<b>8.0 REFERENCES .....</b>	<b>6</b>
<b>9.0 ATTACHMENTS.....</b>	<b>6</b>

<b>TA-54, Area G PCB Compliance Monitoring</b>	No. EPC-CP-QP-205	Page 4 of 6
	Revision: 0	Effective Date: 07/14/2016

## 1.0 INTRODUCTION

This procedure ensures that EPC-CP at Los Alamos National Laboratory documents the analyses of environmental samples collected at TA-54 to meet requirements in accordance with the Letter of Authorization (U.S. EPA 1980) and any permits.

### 1.1 Purpose

This procedure describes the process by which the Laboratory's EPC-CP ensures that environmental samples that reflect on TA-54, Area G, are collected and analyzed in order to ensure that the parameters set in the Letter of Authorization (U.S. EPA 1980) are documented.

### 1.2 Scope

This procedure encompasses the process followed by EPC-CP to ensure that PCB environmental samples are collected at TA-54 Area G disposal area.

### 1.3 Applicability

This procedure applies to all EPC-CP personnel who report on the environmental samples relating to PCB-contaminated wastes at the TA-54, Area G disposal area.

## 2.0 PRECAUTIONS AND LIMITATIONS

The work described in this procedure is office work only and has a **LOW hazard** rating.

### 2.1 Prerequisites

None.

## 3.0 RESPONSIBILITIES

Actions specified within this procedure, unless proceeded with "should" or "may," are to be considered mandatory (i.e., "shall," "will," "must".)

## 4.0 WORK PROCESS DESCRIPTION

### 4.1 R-57 Monitoring

Each January, the EPC-CP PCB Management Coordinator will:

- Contact LANL's Environmental Remediation Environmental Stewardship Group (ER-ES) to determine when groundwater from "R-57" will be sampled. The sampling year begins on July 1<sup>st</sup> and runs to June 30<sup>th</sup>.
- Specifically, EPC-CP will confirm that R-57 sampling will be analyzed for the parameters specified in 40 CFR 761.75(b)(6)(iii), i.e., PCBs, pH, specific conductance, and chlorinated organics.

<b>TA-54, Area G PCB Compliance Monitoring</b>	No. EPC-CP-QP-205	Page 5 of 6
	Revision: 0	Effective Date: 07/14/2016

- In January of each year, the EPC-CP will contact EPC-CP's subject matter expert for the Environmental Information Management (EIM) database to confirm that the groundwater monitoring has been completed and to request the analytical records.

#### **4.2 Storm Water Monitoring**

Each January, the EPC-CP PCB Management Coordinator will:

- Contact LANL's Waste Management Division (WM) to assure that storm water runoff will be sampled. Accomplishment of this task relies on the occurrence of an adequate rain storm event. The sampling year begins on July 1<sup>st</sup> and runs to June 30<sup>th</sup>.
- Specifically confirm that storm water runoff samples be analyzed for the parameters specified in 40 CFR 761.75(b)(6)(iii):
  - PCBs
  - pH
  - Specific conductance
  - Chlorinated organics

The Waste Management Services organization is responsible for conducting the sampling.

#### **4.3 Reporting Requirements**

The EPC-CP PCB Management Coordinator must include the water quality data in the PCB Annual Records/Document Log that is made available to EPA upon request.

#### **5.0 TRAINING**

The training method for this procedure is "self-study" (required reading). For EPC-CP staff, this is documented in accordance with [ENV-DO-QP-115, Personnel Training](#). Waste management generators and coordinators may require training documentation pursuant to local procedures.

The following personnel require training before implementing this procedure:

- EPC-CP PCB Management Coordinator

#### **6.0 DEFINITIONS AND ACRONYMS**

**Letter of Authorization** – The June 5, 1980 letter from EPA authorizing disposal of PCBs at TA-54, Area G, which also sets the terms and conditions for that disposal. The disposal of PCB waste at TA-54 ceased effective May 19, 2006. The Department of Energy committed to continue the water quality monitoring required under the Letter of Authorization until an alternate monitoring plan is approved in the TA-54 Area G closure plan.

<b>TA-54, Area G PCB Compliance Monitoring</b>	No. EPC-CP-QP-205	Page 6 of 6
	Revision: 0	Effective Date: 07/14/2016

See LANL [Definition of Terms](#).

## **7.0 RECORDS**

The following records are generated as a result of this procedure are maintained in accordance with [ADESH-AP-006](#), Records Management Plan and P1020-1, Laboratory Records Management. Records generated, but not limited to, include:

- Copies of monitoring/sampling and analytical records
- General correspondence on the program
- Specific notices of non-compliance sent to EPA

## **8.0 REFERENCES**

U.S. EPA (Environmental Protection Agency) 1980: Letter from Adlene Harrison (U.S. EPA Regional Administrator, Region VI, Dallas) to Kenneth Braziel (U.S. DOE Albuquerque Operations, Los Alamos Area Office, Area Manager), June 5, 1980.

## **9.0 ATTACHMENTS**

None.