

LANL ACO 120614 VS

Viol #	Citation	Violation	Initial Penalty	Initial Basis	Penalty Policy for Multiday (Gravity based)
1	40 CFR § 270.1(c)	Failure to obtain a permit to treat hazardous waste outside authorization of the elementary neutralization exemption – neutralizers.	3,530,250	Major-major 232c, 60d 5, 15, 15	Mandatory
2	40 CFR § 270.1(c)	Failure to obtain a permit to treat hazardous wastes outside the absorption exemption – absorbents.	9,470,250	Major-major 672c, 60d 5, 15, 15	Mandatory
3-4	PC 2.2 40 CFR § 270.1(c)	Failure to obtain a permit to treat hazardous waste (treatment in unauthorized unit).	425,250	Major-major 2c, 60d 5, 15, 15	Mandatory
5	PC 1.6.2 40 CFR § 270.42	Failure to obtain a permit to treat hazardous waste at TA-50-69 (failure to submit permit modification request).	444,899	Major-major 2c, 60d 5, 15, 15 \$19,649 eco ben	Mandatory
6-7	PC 1.5 PC 1.9.14 PC 1.9.15 40 CFR § 270.30(l)(11) 40 CFR § 270.43(a)(2)	Failure to notify NMED in writing within 30 days of discovery of the deviation from the information contained in the Application that caused Permit noncompliance. Failure to notify NMED that relevant facts had not been submitted or incorrect information had been submitted in the Permit Application.	425,250	Major-major 2c, 60d 5, 15, 15	Mandatory
8	PC 1.9.11 40 CFR § 270.30(l)(2)	Failure to provide advanced written notice of treatment of hazardous waste.	425,250	Major-major 2c, 60d 5, 15, 15	Mandatory
9	PC 1.9.21 40 CFR § 270.30(l)(2)(i) and (ii) 40 CFR § 270.42	Failure to provide NMED opportunity to inspect the modified treatment unit.	425,250	Major-major 2c, 60d 5, 15, 15	Mandatory
10	PC 2.4.1 PC C.3.2 40 CFR § 264.13	Failure to adequately characterize waste (acceptance of waste for storage and treatment that were not fully characterized).	452,250	Major-major 4c, 60d 5, 15, 15	Mandatory
11-14	PC 2.4.7 PC 2.4.7(1) PC 2.4.7(2) PC C.3	Failure to ensure initial characterization or annually reevaluate waste streams LA-MIN02-V.001, LA-CIN01.001, LA-MIN04-S.001, and LA-MHD01.001 or to review/repeat to verify that the characterization was accurate and up to date.	1,242,000	Major-major 92c, 0d 5, 15, 15	Mandatory

LANL ACO 120614 VS

Viol #	Citation	Violation	Initial Penalty	Initial Basis	Penalty Policy for Multiday (Gravity based)
15	PC 2.8 40 CFR § 264.177(a)	Mixing incompatible waste or materials in a container. Improper mixing of incompatible wastes (nitrate salts) and materials (organic kitty litter and organic neutralizers) in the same container.	9,470,250	Major-major 672c, 60d 5, 15, 15	Mandatory
16	PC 2.8(1) PC 2.8(5) 40 CFR § 264.17(b)	Failure to appropriately manage incompatible waste. Failure to take precautions during the treatment or storage of ignitable or reactive waste, the mixing of incompatible waste, or the mixing of incompatible wastes and other materials to prevent reactions that could lead to or cause generation of extreme heat, pressure, fire, explosions, or violent reactions and cause a threat to human health or the environment.	9,470,250	Major-major 672c, 60d 5, 15, 15	Mandatory
17	PC 1.9.12.1 40 CFR § 270.30(l)(6)(i)	Failure to notify NMED of noncompliances that endangered human health and the environment (24 hour oral report).	411,750	Major-major 1c, 60d 5, 15, 15	Mandatory
18	PC 1.9.12.2 40 CFR § 270.30(l)(6)(iii)	Failure to notify NMED of noncompliances that endangered human health and the environment (5 day written report).	411,750	Major-major 1c, 60d 5, 15, 15	Mandatory
		\$	36,604,649		