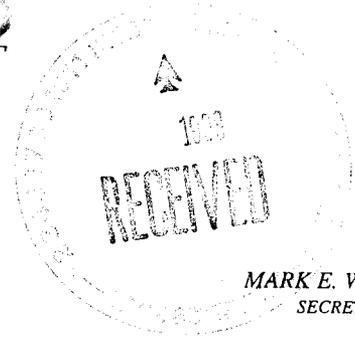


JT



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
OFFICE OF GENERAL COUNSEL
PHONE: 505-827-2990
FAX: 505-827-1628



MARK E. WEIDLER
SECRETARY

October 9, 1998

BY FACSIMILE

665-4424
Sheila E. Brown, Esq.
Los Alamos National Laboratory
P.O. Box 1663, MS A187
Los Alamos, NM 87545

BY FACSIMILE

665-4873
Joyce Hester Laeser
Counsel
United States Department of Energy
Los Alamos Area Office
528 35th Street
Los Alamos, NM 87544

Dear Sheila and Joyce:

In accordance with our conversation last Friday, I am writing to request that UC and DOE produce all documents in their possession, custody or control responsive to the following requests:

1. All maps and other documents which depict the location of Pit A and other pits, shafts or tunnels located in the immediate vicinity of the former site of "Pad A" and the "swale" referred to in your Answers to the Administrative Compliance Order. (I am especially interested in documents which depict the location of SWMU # TA-54 MDA-L Pit A ("Pit A") or other pits, shafts or tunnels relative to the former location of "Pad A" and the "swale");
2. All documents which refer to, relate to, evidence or discuss the placement, storage or disposal of any materials of any type in Pit A, including but not limited to inventories of wastes placed, stored or disposed of in Pit A, which identify the types of wastes disposed of, the time and volume of such disposal;



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3. All documents which refer to, relate to, evidence or discuss the design, construction, maintenance, covering or capping of Pit A. (I am particularly interested in documents which discuss whether or not any soil or other materials were placed on top of the wastes disposed of in Pit A).
4. All documents which refer to, relate to, evidence or discuss the sampling or analysis of materials placed, stored or disposed of in Pit A.
5. All documents which refer to, relate to evidence or discuss possible hazards to human health and the environment posed by conditions at Pit A, including but not limited to assessment or characterization of conditions at the site and assessment or characterization of actual or potential releases of contaminants from the site.
6. All documents which refer to, relate to, evidence or discuss sampling, analysis and testing of any asphalt, soil or other material removed from the site of former Pad A and the swale, including but not limited to the sampling and analysis conducted in approximately April 1994. (This should include the map showing locations from which the April 1994 samples were taken which you mentioned in our meeting last Friday).
7. All documents which refer to, relate to, evidence or discuss the "process knowledge" which UC refers to in subparagraph d of its Answer to Paragraph 44 of the Compliance Order.
8. All correspondence, notes, logs, progress reports, change orders and other documents referring to, relating to discussing or evidencing the following:
 - a. The utility upgrade at Area L in July and August 1994, the excavation of soil and asphalt during or following the utility upgrade and all movement, storage, disposal, use or other disposition of the soil and asphalt following its excavation;
 - b. The demolition of "Pad A," the excavation of soil and asphalt from the area of Pad A during or following its demolition, and all movement, storage, disposal, use or other disposition of the soil and asphalt following its excavation;
 - c. The construction of "Pad AA" and the use of soil and asphalt taken from the area of Pad A in the construction of Pad AA;
 - d. The demolition of the "swale," the excavation of soil and asphalt during or following demolition of the swale, and all movement, storage, disposal, use or other disposition of the soil and asphalt following its excavation;

- e. To the extent not included in response to the above requests, transportation of soil and asphalt excavated from the area of Pad A or the swale to the area of the compactor building in Area G;
 - f. construction of the pad for the compactor dome in Area G and movement and backfilling of soil and asphalt in connection with such construction;
 - g. transportation of soil and asphalt from the area of the compactor dome in Area G during or following construction of the pad for the dome, including but not limited to transportation to the rubble pile at the Los Alamos County Landfill and Pit 37, Area G, and placement or disposal of such soil and asphalt in the rubble pile and Pit 37, Area G.
9. To the extent not produced in response to Request No. 8 all documents referring to, relating to, evidencing or discussing the decisions to perform the actions listed in Request No. 8, including but not limited to documents identifying persons involved in those decisions.
10. To the extent not produced in response to other requests, all manifests for asphalt or soil referred to in any of the above requests.
11. All documents evidencing circulation of the July 22, 1994 letter from Benito Garcia to Joseph Vozella within UC and DOE, including all documents indicating who received a copy of the letter and when.

In accordance with our discussion on Friday, please let me know if you have any problems with or suggested refinements to these requests. If you prefer, I will put these requests into the form of a formal Request for Production. Thank you.

Sincerely,


Nicholas F. Persampieri

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LOS ALAMOS NATIONAL LABORATORY

08/17/98

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HWTS SYSTEM

10:43 AM

SITE FMU

ID.	No.	TA	BLDG	ROOM	LOCATION	OPERATION	FACILITY	TYPE	T	S	D	STATUS	GROUP	CONTACT	PHONE
1721	65	3	29	0	SKEDS & TRUCKS BEHIND BLD	CONTAINER	LESS 90 DAY		N	N	N	ACTIVE	EM-8WO	DON BAKER	7-5144
1811	65	3	29	0	HALLWAY	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	DAN GERTH	5-0403
1814	65	3	29	0	HALLWAY - CABINET #9	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	LARRY CALLIS	7-9903
1824	65	3	29	2023	NORTH SIDE OF 2023	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-11	TOM ZOCCO	7-4481
403	65	3	29	2057	WING 2 BASEMENT SHOP	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-11	MANUEL L. LOVATO	7-5346
961	65	3	29	2074	WING 2 BASEMENT	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-11	KARL STAUDHAMMER	7-9333
960	65	3	29	2102	CABINET IN HALLWAY - EAST	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-11	THOMAS ZOCCO	7-4481
1830	65	3	29	2102	FLAMMABLE CABINET IN HALL	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-11	TOM ZOCCO	7-4481
1823	65	3	29	2114	WHOLE ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-11	TOM ZOCCO	7-4481
405	65	3	29	2121	WING 2	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-11	THOMAS ZOCCO	7-4481
406	65	3	29	2123	WING 2	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-11	THOMAS ZOCCO	7-4481
1833	65	3	29	2130	WHOLE ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-11	TOM ZOCCO	7-4481
1285	65	3	29	2156	WING 2	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-5	LUIS MORALES	5-7703
1363	65	3	29	3051	ON BENCHTOP NEAR HOOD	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-7	RICK STAROSKI	5-5851
1707	65	3	29	3102	OUTSIDE RM 3120 TO RIGHT	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	DOLORES TRUJILLO	7-9645
1715	65	3	29	3102	OUTSIDE OF ROM 3102C	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	DOLORES TRUJILLO	7-9645
1444	65	3	29	3110	AREA AROUND HOODS	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	ANTHONY LOMBARDO	5-7410
1410	65	3	29	3116	IN AND UNDER HOOD	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	KIRK HOLLIS	5-5656
1466	65	3	29	3121	WHOLE ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	LAURA ORTEGA	7-7407
1821	65	3	29	3123	WHOLE ROOM AND 3125	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	DORIS QUINTANA	5-7412
861	65	3	29	3127	WET LAB ON COUNTER	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	NELSON STALNAKER	7-9641
1798	65	3	29	3131	WHOLE ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	LISA TOWNSEND	7-5096
1827	65	3	29	3131	ROOM IS 3131B	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	AMY WONG	7-5096
1720	65	3	29	3135	NORTHWEST CORNER	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	AMY WONG	7-0000
1465	65	3	29	3136	IN HOOD NEAR ENTRANCE	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	DORIS QUINTANA	5-7412
1768	65	3	29	3145	IN FLAMMABLE CABINET	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	TOM MARSHALL	7-9638
161	65	3	29	3162	STORAGE/SUPPLY ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	CST-10	BARBARA SMITH	7-2391
1810	65	3	29	4023	WHOLE ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-2	JON NEILSEN	5-8763
1809	65	3	29	4060	WHOLE ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-2	JON NIELSON	7-9763
1688	65	3	29	4066	IN MARKED CABINETS	CONTAINER	SATELLITE		N	N	N	ACTIVE	CST-7	JOHN FITZPATRICK	5-1761
1132	65	3	29	4155	ON FLOOR AND IN HOOD	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-11	PETE DEL MAR	7-8378
1347	65	3	29	4167	WHOLE ROOM	CONTAINER	LESS 90 DAY		N	N	N	ACTIVE	NMT-7	RICK STAROSKI	5-5851
1571	65	3	29	4167	IN BUCKET ON TABLE	CONTAINER	UWA		N	N	N	ACTIVE	NMT-7	RICK STAROSKI	5-5851
1822	65	3	29	5064	WHOLE ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	ESH-1	MIKE JENSON	5-7267
1752	65	3	29	5072	IN LOCKED CAGE	CONTAINER	LESS 90 DAY		N	N	N	ACTIVE	NMT-7	LORENZO TRUJILLO	7-2317
1708	65	3	29	5102	OUTSIDE ROOM 5127	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	ELMER LUJAN	7-4076
1716	65	3	29	5102	LOCATED OUTSIDE RM. 5114	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	ELMER LUJAN	7-4076
502	65	3	29	5110	FLAMMABLE CABINET S WALL	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	DREW TAIT	5-0008
1761	65	3	29	5117	WHOLE ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	VELMA MONTOYA	7-4088
1826	65	3	29	5119	WHOLE ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	JAMES DYKE	5-9398
133	65	3	29	5121	IN HALL OUTSIDE RM 5121	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	TOM MARSHALL	7-9638
1718	65	3	29	5122	TRAY ON BENCHTOP	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	LARRY CALLIS	7-9903
959	65	3	29	5125	IN 30 GALLON DRUM	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	ADRIAN LOVELL	7-9639
958	65	3	29	5127	LEFT HALF OF CABINET SW	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	TOM MARSHALL	7-9638
1825	65	3	29	5133	WHOLE ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	JAMES DYKE	5-9395
1799	65	3	29	5134	TOP SHELF IN FLAMM. CABINE	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	DAVID WAYNE	5-5933
1575	65	3	29	5136	ENTIRE ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	RICK STAROSKI	5-6851
1604	65	3	29	5153	IN HOOD IN SPILL CONTAIN	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	DON TSMER	7-9636
1815	65	3	29	7061	FLAMMABLE CABINET AND SINK	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	PAUL MENDOZA	5-5413
1706	65	3	29	7102	OUTSIDE ROOM 7112	CONTAINER	SATELLITE		N	Y	N	ACTIVE	NMT-1	ALEX MARTINEZ	7-7759
1717	65	3	29	7102	LOCATED OUTSIDE RM 7136	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	ALEX MARTINEZ	7-7759
956	65	3	29	7112	IN LOCKED CABINET	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	SUSAN PACHECO	7-9624
1764	65	3	29	7115	HOOD #3010 SE CORNER	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	MIKE JOHNSON	7-8696

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SITE PMU

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HWTS SYSTEM

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ID.	No.	TA	BLDG	ROOM	LOCATION	OPERATION	FACILITY	TYPE	T	S	D	STATUS	GROUP	CONTACT	PHONE
1263	65	3	29	7116	DARKROOM AND E. SIDE	7116 CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	CONCHA COLLIER	7-9623
1550	65	3	29	7118	ENTIRE ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	LAVERNE GALLEGOS	7-9624
953	65	3	29	7121	IN AND UNDER HOOD	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	DON VANCE	7-9832
1813	65	3	29	7124	WHOLE ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	DAN GERTH	5-0403
1391	65	3	29	7133	IN 30 GAL DRUM AND TANKS	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	TONY LOMBARDO	5-5686
1794	65	3	29	7133	SOUTH EAST/OPEN FRONT	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	DON VANCE	7-9832
955	65	3	29	7134	GLOVE BOX	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	SUSAN PACHECO	7-9624
1812	65	3	29	7135	WHOLE ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	DAN GERTH	5-0403
1777	65	3	29	7137	ENTIRE GLOVEBOX IN ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	ALICE SLIMMONS	7-9591
454	65	3	29	9010	BASEMENT WING 9/FM 9020	CONTAINER	INTERIM		N	Y	N	ACTIVE	NMT-11	LARRY FIELD	7-4782
849	65	3	29	9030	TAPED AREA SOUTHWEST WALL	CONTAINER	INTERIM		N	Y	N	ACTIVE	NMT-11	JAMES LEDBETTER	7-4653
1832	65	3	29	9030	FENCED AREA COVERING 9020	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-11	JAMES LEDBETTER	7-4653
148	65	3	29	9149	ON SPILL SKID	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-11	LAWRENCE PITT	7-4653
1831	65	3	29	9165	NORTH WALL IN CABINET	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-11	JIM LEDBETTER	7-4653
1386	65	3	29	8011	ENTIRE ROOM	CONTAINER	SATELLITE		N	N	N	ACTIVE	NMT-1	DON VANCE	7-9832