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ENTERED



RON CURRY
Secretary

JON GOLDSTEIN
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 15, 2009

David Gregory
Federal Project Director
Los Alamos Site Office
Department of Energy
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David McInroy
Remediation Services Deputy Project Director
Los Alamos National Laboratory
P.O. Box 1663, MS M992
Los Alamos, NM 87545

**RE: APPROVAL WITH MODIFICATIONS
OBSERVATION PLAN FOR DEMOLITION OF THE BAYO CANYON
WASTEWATER TREATMENT PLANT, AREA OF CONCERN 00-018(b), BY
LOS ALAMOS COUNTY
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-09-007**

Dear Messrs. Gregory and McInroy:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) and the Los Alamos National Security L.L.C.'s (LANS) (collectively, the Permittees) *Observation Plan for Demolition of the Bayo Canyon Wastewater Treatment Plant, Area of Concern 00-018(b), by Los Alamos County, (Plan)* dated April 2009 and referenced by LA-UR-09-1814/EP2009-0173. NMED hereby approves the Plan with the following modifications:

31508



Specific Modifications:

1. The Permittees have proposed observation, photographic documentation and radiological field screening during ground-disturbing activities associated with demolition of Area of Concern (AOC) 00-018(b).

The Permittees must also screen for the presence of organic contaminants using visual and olfactory observations and provide headspace organic vapor field screening during ground-disturbing activities using a photo-ionization detector (PID) equipped with a 10.6 electron volt (eV) lamp or other instrument type that will provide comparable screening information. The organic vapor screening shall be conducted in accordance with Section IX.B.2.d of the Consent Order. In the event that screening results indicate the potential presence of contamination, the Permittee shall collect a representative environmental media sample of material showing the highest field screening evidence of contamination from a given ground-disturbance area and submit the sample(s) for laboratory analyses of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs) and Target Analyte List (TAL) metals.

2. Although the Permittees have proposed observation, photographic documentation and field screening during ground-disturbing activities, the Permittees have not indicated how the documentation and screening activities will be reported to NMED.

The Permittees shall notify NMED by electronic mail within five days of the completion of field activities. Within 60 days of completion of ground-disturbing activities associated with AOC 00-018(b) demolition, or within 60 days of submittal of the last environmental media sample(s) (whichever is later), the Permittees shall submit an AOC 00-018(b) Demolition Documentation Report (Report) to NMED. The Report shall include discussion of all field work conducted during ground-disturbing and site demolition activities, provide summary tables of all field screening results and laboratory analytical results (if any) and provide labeled photographic logs of any observed media staining/field screening locations. A map shall be included showing site ground-disturbing areas selected for field screening activities including laboratory analytical sample collection locations, if any. All future project submittals (including maps) must be in the form of two paper copies and one electronic copy in accordance with Section XI.A of the Consent Order.

3. The Permittees have proposed consultation(s) with the Los Alamos County demolition project manager in the event radiation field screening results indicate possible radioactive materials contamination.

The Permittees must consult with NMED in the event any field screening results indicate possible site contamination.

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In the event the Permittees document site areas which show a release or releases may have occurred, NMED may require additional site characterization.

Please contact Daniel Comeau at (505) 476-6043, if you have any questions.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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File: 2009 LANL Pueblo Canyon Aggregate Area [AOC 00-018(b) Demolition
Observation Plan]