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BILL RICHARDSON
Governor

DIANE DENISH
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us



RON CURRY
Secretary

JON GOLDSTEIN
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 19, 2009

David Gregory
Federal Project Director
Los Alamos Site Office
Department of Energy
3747 West Jemez Road, Mail Stop A316
Los Alamos, NM 87544

David McInroy
Remediation Services Deputy Project Director
Los Alamos National Laboratory
P.O. Box 1663, MS M992
Los Alamos, NM 87545

**RE: CLARIFICATION CONCERNING 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:

On April 15, 2009 the New Mexico Environment Department (NMED) issued an Approval With Modifications to the *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 submitted by the United States Department of Energy (DOE) and the Los Alamos National Security L.L.C.'s (LANS) (collectively, the Permittees). Since that time, NMED has had several discussions with the Permittees' staff concerning how Los Alamos County's (LA County's) demolition contractor intends to conduct demolition activities at the Bayo Canyon Wastewater Treatment Plant (Bayo WWTP).

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This clarification is being provided because there may be some uncertainty about whether the Permittees will be able to fulfill the requirements of the current Plan as approved with modifications. For example, NMED first learned during a June 19, 2009 site visit with LA County and Permittees' representatives that LA County plans to punch drainage holes in the base of various tank and sludge bed structures. NMED also learned during the site visit that the base of all or most site structures will remain below grade after demolition activities are completed.

The demolition contractor currently plans to use a pneumatic hammer or similar equipment to create holes in the impermeable base of the various Bayo WWTP treatment tanks and the sludge beds. The holes will be located on approximately ten foot centers within the structures. The purpose of partially breaking up the tank and sludge bed bases is to reduce the potential for water ponding above the structures after post-demolition site grading is completed.

The rocks that are currently present in the bottom of the trickling filter tanks may or may not present access problems in terms of the Permittees being able to conduct field screening activities at the hammer-created hole locations. If the locations are accessible for screening (and possible soil sample collection), the Permittees will screen four quadrant locations (approximately equal in size) within each tank footprint and screen one location within each sludge bed that may have received wastes from the former Health Research Laboratory (HRL) at Technical Area (TA) 43. The Permittees are currently evaluating which of the sludge beds are most likely to have received wastes from the HRL.

In the event that the hole locations within the tank structures are not accessible for field screening evaluation, the Permittees will request that the contractor dig small test pits on the down slope sides of the tank structures so that soils at the approximate elevation beneath the tank floors (which will remain in place after demolition activities are completed) can be screened adjacent to the structures. Alternatively, hand augers can be used by the Permittees to access a single location down slope of each tank in order to collect field screening information at a given location.

The Permittees must provide NMED with a map showing potential field screening locations prior to startup of site demolition activities. The map must also be available to the Permittees' field technicians as guidance for their field screening activities.

It is understood by NMED that visual and olfactory observations by the Permittees will determine which site areas may require subsequent field screening evaluation. All other terms and conditions outlined in NMED's April 15, 2009 Approval With Modifications of the Plan remain in effect. The Permittees will notify NMED by phone within 24 hours of finding that the demolition contractor's general demolition plan changes in ways that could affect the Permittees' performance of the work outlined in the current Plan.

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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: J. Bearzi, NMED HWB
J. Kieling, NMED HWB
D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
K. Roberts, NMED HWB
D. Comeau, NMED HWB
S. Yanicak, NMED DOE OB, MS J993
T. Skibitski, NMED DOE OB
R. Wheeler, LA County
L. King, EPA 6PD-N
G. Rael, DOE LASO, MS A316
M. Graham, LANS ADEP, MS M991
File: 2009 LANL Pueblo Canyon Aggregate Area [AOC 00-018(b) Demolition
Observation Plan]