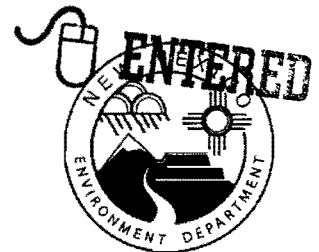


03



NEW MEXICO
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

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

DAVE MARTIN
Secretary

RAJ SOLOMON, P.E.
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 14, 2011

George J. Rael
Assistant Manager
U.S. Department of Energy
National Nuclear Security Administration
Los Alamos Site Office
3747 West Jemez Rd, MSA316
Los Alamos, NM 87544

Michael J. Graham
Associate Director Environmental Programs
Los Alamos National Security, L.L.C.
P.O. Box 1663, MS M991
Los Alamos, NM 87545

**RE: NOTICE OF DISAPPROVAL
NOTIFICATION OF ADDITIONAL DEMOLITION ACTIVITIES FOR
SECOND QUARTER 2011
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-11-MISC**

Dear Messrs. Rael and Graham:

The New Mexico Environment Department (NMED) has reviewed the United States Department of Energy (DOE) and Los Alamos National Security, L.L.C.'s (collectively, the Permittees) document entitled *Notification of Additional Demolition Activities for Second Quarter 2011*(Notification), dated March 29, 2011 and referenced by LA-UR-11-01562/ENV-RCRA-11-0058. NMED hereby issues this Notice of Disapproval (NOD). The following comments must be addressed before NMED can consider the notification further.

Comment 1

The spreadsheet attachment does not contain the information required by Items 2 and 3 of the Los Alamos National Laboratory Hazardous Waste Permit (Permit) Section 1.17.1. The current and historic uses of the listed buildings and their dates of operation are not



included for 21 of the 22 buildings on the list. While in some instances it is possible to discern some of the processes conducted in buildings from the description of the solid waste management units (SWMUs) or areas of concern (AOCs) located within 50 feet of the building footprint (e.g., SWMUs 18-003 (f), (g) and (h), SWMU 18-001(c)), a separate description of the current and historic uses of all of the buildings and their dates of operation must be included in the spreadsheet.

Comment 2

Permit Section 1.17.1 also states, “[t]he list shall be accompanied by an attachment that shall describe the processes or conditions that may result in the presence of hazardous material in each building or fixed structure.”

No such attachment was included with the Notification.

The Permittees must submit a revised Notification that addresses these deficiencies no later than **May 26, 2011**. The Permittees must state, in the appropriate column in the spreadsheet attachment, if any of the required information is unavailable.

If you have any questions regarding this extension approval, please contact John Kieling of my staff at (505) 476-6035.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc: J. Kieling, NMED HWB
D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
T. Skibitski, NMED DOE OB
S. Yanicak, NMED DOE OB, MS M894
L. King, EPA 6PD-N
G. Turner, LASO-EO MS A316
A. Grieggs, ENV-RCRA MS K490
M. Haagenstad, ENV-RCRA MS K490
J. Chris Cantwell, ADESHQ, MS K491
V. George, EP-CAP, MS M992

File: Reading and LANL 2011 – Building Demolition Notification Second Quarter 2011