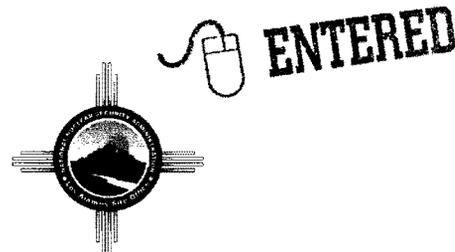


03



Environment Protection Division
Water Quality & RCRA Group (ENV-RCRA)
P.O. Box 1663, K490
Los Alamos, New Mexico 87545
(505) 667-0666/FAX: (505) 667-5224

National Nuclear Security Administration
Los Alamos Site Office, A316
3747 West Jemez Road
Los Alamos, New Mexico 87545
(505) 667-5105/FAX (505) 667-1718

Mr. John Kieling
Acting Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303



Date: May 16, 2011
Refer To: ENV-RCRA-11-086
LAUR: 11-01562

SUBJECT: RESPONSE TO NOTICE OF DISAPPROVAL NOTIFICATION OF ADDITIONAL DEMOLITION ACTIVITIES FOR SECOND QUARTER 2011 (LA-UR 11-01562)

Dear Mr. Kieling:

On April 19, 2011, the United States Department of Energy (DOE) and Los Alamos National Security, L.L.C. (collectively, the Permittees) received the New Mexico Environment Department Hazardous Waste Bureau's (NMED-HWB) *Notice of Disapproval Notification of Additional Demolition Activities for Second Quarter 2011*. Enclosure 1 and the following information have been provided by the Permittees to address NMED-HWB's Notice of Disapproval:

NMED-HWB 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 spreadsheet.

Permittees' Response:

The current and historic uses and dates of operation have been identified and updated on the spreadsheet of Enclosure 1.

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NMED-HWB Comment 2:

Permit Section 1.17.1 also states, "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.

Permittees' Response:

As required under Section 1.17.1 of the Permit, the Permittees list the presence of hazardous materials expected to be present in the buildings prior to demolition in the "category" column on Enclosure 1. Other than the enclosure, no attachment was provided because no hazardous materials or processes are anticipated or had been identified during the demolition phase of the notification. Should a process or condition that may result in a hazardous material be identified, such initial information will be described in the "category" column with further descriptions in an attachment.

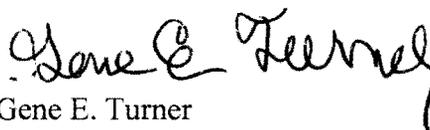
Please contact Mark Haagenstad of the Water Quality & RCRA Group (ENV-RCRA) at (505) 665-2014 if additional information would be helpful.

Sincerely,



Anthony R. Grieggs
Group Leader
Water Quality & RCRA Group
Los Alamos National Security, LLC

Sincerely,



Gene E. Turner
Environmental Permitting Manager
Environmental Projects Office, LLC
Los Alamos Site Office
National Nuclear Security Administration

ARG:GET:CJ/lm

Enclosure: a/s

Cy: George Rael, LASO-EO, w/o enc., A906
Gene Turner, LASO-EO, w/enc., A316
Michael B. Mallory, PADOPS, w/o enc., A102
Jay Johnson, ADMIP, w/o enc., M984
J. Chris Cantwell, ADESHQ, w/o enc., K491
Alison Dorries, WES-DO, w/o enc., K491
Jim Jones, SP-DO, w/o enc., J590
Darrik Stafford, SP-DISP, w/enc., J590
Ian Albright, PMF-FUNCT, w/enc., J590
Allan Chaloupka, TA21, w/o enc., C348
Duane Parsons, PMFS-DO, w/enc., C349
Kevin Finn, TA21, w/o enc., C349

Cy (continued):

Mark Haagenstad, ENV-RCRA, w/enc., K490 (E-File)

Catherine Juarez, ENV-RCRA, w/enc., K490 (E-File)

Connie Gerth, ENV-ES, w/enc., C919

John Tymkowych, ENV-ES, w/enc., C925

Mark Thacker, PMFS-DO, w/enc., C349

Janet Harry, IP-SDFD, w/enc., M895

ADESHQ Files, w/o enc., K491

ENV-DO File, w/o enc., K404

ENV-RCRA File, w/enc., K490

IRM-RMMSO, (U1100743) w/enc., A150

ENCLOSURE 1

BUILDINGS TO BE DEMOLISHED DURING SECOND QUARTER 2011- Response to Notice of Disapproval

Technical Area (TA) and building number	Type of Structure	Current and historic uses	Approximate dates of Operation	Solid Waste Management Units (SWMU)/ Areas of Concern (AOC) w/in 50 ft. of footprint	Category	Date /Quarter Demolition expected to begin	Buildings or Fixed Structures identified in previous fiscal year that were not demolished
18-0028	Metal Building	Warehouse- Programmatic General Storage	1948-2007	<p>SWMU 18-003(g) is an inactive septic system at TA-18 that includes an inlet line, a septic tank (structure 18-43), and a discharge line. The reinforced concrete septic tank is located approximately 50 ft north of building 18-28. The tank is 3 ft wide x 5 ft long x 5 ft deep, and its estimated capacity is 500 gal. From 1944 to the present, the septic system has been receiving sanitary and photochemical laboratory waste from building 18-1. Most of building 18-1 was demolished in 1968, leaving only a high bay, which is currently used as an electronic assembly and storage area. In 1969, SWMU 18-003(g) was connected to the site sewer system that routed effluent to the sanitary sewage lagoons, which changed the function of the tank to a settling pit. Since 1992, the septic system waste has been pumped to the SWSC plant at TA-46. SWMU 18-003(h) is an active septic system at TA-18 that includes an inlet line, a septic tank (structure 18-152), and a discharge line. The septic tank is located approximately 10 ft north of building 18-28. This steel tank measures 4.3 ft in diameter x 5 ft deep and has a capacity of 500 gal. From 1967 to the present, the septic system has been receiving sanitary waste from building 18-147. In 1969, SWMU 18-003(h) was connected to the site sewer system that routed effluent to the sanitary sewage lagoons, changing the function of the tank to a settling pit. Since 1992, the septic system waste has been pumped to the SWSC plant at TA-46. SWMUs 18-003(g & h) will not be impacted during D&D and will be investigated as part of a near future investigation.</p>	None	2nd Quarter	NA

BUILDINGS TO BE DEMOLISHED DURING SECOND QUARTER 2011- Response to Notice of Disapproval

Technical Area (TA) and building number	Type of Structure	Current and historic uses	Approximate dates of Operation	Solid Waste Management Units (SWMU)/ Areas of Concern (AOC) w/in 50 ft. of footprint	Category	Date /Quarter Demolition expected to begin	Buildings or Fixed Structures identified in previous fiscal year that were not demolished
18-0030	Cast Concrete	Main Bldg-Office	1953-2009	<p>SWMU 18-001(c) consists of a sump, equipped with two sump pumps and a drain, located at TA 18 in the basement of building 18-30. Building 18-30 was an administrative building that housed control systems for remote nuclear criticality research. The sump, which was placed into service in 1969, served primarily to collect groundwater from drains outside the basement walls; however, some sinks and floor drains from offices and machine shops in building 18-30 formerly drained to the sump. Discharge from the sump was combined with other discharges from buildings 18-30 and 18-31 and was released through an outfall [SWMU 18-012(b)] south of building 18-30. In the fall of 1992, the drains associated with the sump were diverted from the sump and connected to the TA-18 sanitary sewer line and subsequently to SWSC. The sump was not connected to the sanitary sewer system. SWMU 18-003(f) is an inactive septic system at TA-18 that includes an inlet line, a septic tank (structure 18-41), a discharge line, and a drain field. The septic system received sanitary and photochemical laboratory effluent from building 18-30 from 1951 to 1969. In 1969, building 18-30 was connected to the sanitary sewage lagoons, and the septic tank was filled with sand. The septic tank, located 25 ft west of building 18-30, is constructed of reinforced concrete, and has a 1000-gal. capacity. The tank drained west to the distribution box and drain field. The drain field is located beneath asphalt pavement and the grassy area west of building 18-30. SWMU 18-004(a) consists of a 3-in.-diameter x approximately 50-ft-long stainless-steel industrial waste line located at TA-18 belowground on the west side of building 18-30. The waste line was connected to sinks that served the west side of building 18-30 and discharged into two associated stainless-steel tanks [SWMU 18-004(b)]. The waste line and associated tanks were in service from the 1950s to 1977 when they were decommissioned. At that time, the inlet end of the waste line was capped and remains inactive. SWMU 18-004(b) consists of an area of potential soil contamination associated with a subsurface concrete containment pit (structure 18-38) that measures 4 ft wide x 9 ft long x 8 ft high and is located at TA-18 on the west side of building 18-30 (Figure 2.13-1). The pit contained two stainless-steel tanks designed to receive radioactively contaminated liquid waste from building 18-30 through an associated 3 in. stainless-steel industrial waste line [SWMU 18-004(a)]. The waste line was connected to sinks that served the west side of building 18-30. A 9-in.-diameter x 6-in.-high sump was built into the floor of the pit, possibly to catch any overflow from the tanks. Whenever the tanks became full, they were taken out for waste removal and cleaning and then returned to service. The tanks and associated waste line were in service from the 1950s to 1977 when they were decommissioned. The tanks were removed in 1977, the concrete bottom of the pit was left in place, the walls of the pit were razed, and the pit was backfilled to grade.</p> <p>AOC 18-010(c) is an outfall at TA-18 that receives stormwater discharge in the form of sheet flow from the paved area east of building 18-30. The outfall discharges to a grassy depression southeast of building 18 30 and south of building 18-31. SWMU 18-012(b) is an outfall that received discharge from several sources in buildings 18-30 and 18 31. The outfall, active since the buildings were constructed in 1950, is located southeast of building 18-30. The outfall received discharge from an associated sump [SWMU 18-001(c)], floor drains, sinks, stormwater from the east wing roof of building 18-31, and a welding quench tank in building 18-30. The outfall also received discharge from machine shop floor drains and stormwater from the roof of building 18-31. Currently, the outfall only receives stormwater from building 18-31. These SWMUs and AOC will be investigated as part of a near future investigation.</p>	None	2nd Quarter	NA

BUILDINGS TO BE DEMOLISHED DURING SECOND QUARTER 2011- Response to Notice of Disapproval

Technical Area (TA) and building number	Type of Structure	Current and historic uses	Approximate dates of Operation	Solid Waste Management Units (SWMU)/ Areas of Concern (AOC) w/in 50 ft. of footprint	Category	Date /Quarter Demolition expected to begin	Buildings or Fixed Structures identified in previous fiscal year that were not demolished
18-0031	Cast Concrete	Utility Bldg-Other Service Buildings	1953-2011	<p>SWMU 18-001(c) consists of a sump, equipped with two sump pumps and a drain, located at TA 18 in the basement of building 18-30. Building 18-30 was an administrative building that housed control systems for remote nuclear criticality research. The sump, which was placed into service in 1969, served primarily to collect groundwater from drains outside the basement walls; however, some sinks and floor drains from offices and machine shops in building 18-30 formerly drained to the sump. Discharge from the sump was combined with other discharges from buildings 18-30 and 18-31 and was released through an outfall [SWMU 18-012(b)] south of building 18-30. In the fall of 1992, the drains associated with the sump were diverted from the sump and connected to the TA-18 sanitary sewer line and subsequently to SWSC. The sump was not connected to the sanitary sewer system. AOC 18-010(c) is an outfall at TA-18 that receives stormwater discharge in the form of sheet flow from the paved area east of building 18-30. The outfall discharges to a grassy depression southeast of building 18 30 and south of building 18-31. SWMU 18-012(b) is an outfall that received discharge from several sources in buildings 18-30 and 18 31. The outfall, active since the buildings were constructed in 1950, is located southeast of building 18-30. The outfall received discharge from an associated sump [SWMU 18-001(c)], floor drains, sinks, stormwater from the east wing roof of building 18-31, and a welding quench tank in building 18-30. The outfall also received discharge from machine shop floor drains and stormwater from the roof of building 18-31. Currently, the outfall only receives stormwater from building 18-31. These SWMUs and AOC will be investigated as part of a near future investigation.</p>	None	2nd Quarter	NA
18-0147	CMU Office Buildir	Office Bldg	1968-2007	<p>SWMU 18-003(g) is an inactive septic system at TA-18 that includes an inlet line, a septic tank (structure 18 43), and a discharge line. The reinforced concrete septic tank is located approximately 50 ft north of building 18-28. The tank is 3 ft wide x 5 ft long x 5 ft deep, and its estimated capacity is 500 gal. From 1944 to the present, the septic system has been receiving sanitary and photochemical laboratory waste from building 18-1. Most of building 18-1 was demolished in 1968, leaving only a high bay, which is currently used as an electronic assembly and storage area. In 1969, SWMU 18-003(g) was connected to the site sewer system that routed effluent to the sanitary sewage lagoons, which changed the function of the tank to a settling pit. Since 1992, the septic system waste has been pumped to the SWSC plant at TA-46. SWMU 18-003(h) is an active septic system at TA-18 that includes an inlet line, a septic tank (structure 18-152), and a discharge line. The septic tank is located approximately 10 ft north of building 18-28. This steel tank measures 4.3 ft in diameter x 5 ft deep and has a capacity of 500 gal. From 1967 to the present, the septic system has been receiving sanitary waste from building 18-147. In 1969, SWMU 18-003(h) was connected to the site sewer system that routed effluent to the sanitary sewage lagoons, changing the function of the tank to a settling pit. Since 1992, the septic system waste has been pumped to the SWSC plant at TA-46. SWMUs 18-003(g & h) will not be impacted during D&D and will be investigated as part of a near future investigation.</p>	None	2nd Quarter	NA

BUILDINGS TO BE DEMOLISHED DURING SECOND QUARTER 2011- Response to Notice of Disapproval

Technical Area (TA) and building number	Type of Structure	Current and historic uses	Approximate dates of Operation	Solid Waste Management Units (SWMU)/ Areas of Concern (AOC) w/in 50 ft. of footprint	Category	Date /Quarter Demolition expected to begin	Buildings or Fixed Structures identified in previous fiscal year that were not demolished
18-0189	Cast Concrete	Communications/ Control Center	1986-2007	SWMU 18-003(e) is an inactive septic system at TA-18 that includes two inlet lines, a cylindrical septic tank (structure 18-40), an outlet line, a drain field, and a former outfall. The septic tank is located approximately 40 ft southeast of building 18-189. The tank is constructed of reinforced concrete and measures 6 ft in diameter x 6 ft high. The septic system received sanitary waste from building 18-31, building 18-37, and building 18-129. While in operation from 1951 to 1969, the septic system may have also received industrial waste from a sink in building 18-28. Septic tanks associated with SWMUs 18-003(g,h) (structures 18-43 and 18-152) may have discharged to this septic system. In 1969, sanitary waste from the buildings was connected to the site sewer system that routed effluent to the sanitary sewage lagoons. At that time, the septic tank was backfilled with sand. This SWMU will not be impacted by D&D activities and will be investigated as part of a near future investigation.	None	2nd Quarter	NA
55-0162	Guard Tower	Guard Tower Sta #420	1985-1994	None.	None	2nd Quarter	NA
03-1524	Trailer	Trailer-Office	1985-1994	AOC 03-007 is a decommissioned firing site located southeast of the building 03-1524 and within the security fence at the Sigma Complex. This AOC includes a containment building for explosive experiments (03-0159) and a personnel safety barrier (structure 03-0160). The site was remediated in the late 1970s, and no explosive compounds were detected. In the mid-1980s, building 03-0159 was modified to serve as a storage building for thoria (oxide) and thorium (metal), which were containerized within the building. This AOC will not be impacted during D&D activities and has been investigated.	None	2nd Quarter	NA
03-1525	Trailer	Trailer-Office	1979-2010	AOC 03-007 is a decommissioned firing site located south of the building 03-1525 and within the security fence at the Sigma Complex. This AOC includes a containment building for explosive experiments (03-0159) and a personnel safety barrier (structure 03-0160). The site was remediated in the late 1970s, and no explosive compounds were detected. In the mid-1980s, building 03-0159 was modified to serve as a storage building for thoria (oxide) and thorium (metal), which were containerized within the building. This AOC will not be impacted during D&D activities and has been investigated.	None	2nd Quarter	NA
03-1540	Trailer	Trailer-Office	1983-2011	None.	None	2nd Quarter	NA
03-1541	Trailer	Trailer-Office	1983-2009	None.	None	2nd Quarter	NA
35--0224	Trailer	Trailer-Office	1969-2008	SWMU 35-014(a) is an area of soil contaminated by laboratory radionuclide stack emissions from a former air filter building (former Building 35-7). This site has been investigated and addressed as part of the Middle Mortandad Investigation.	None	2nd Quarter	NA
35-0226	Trailer	Trailer-Office	1963-2008	SWMU 35-014(a) is an area of soil contaminated by laboratory radionuclide stack emissions from a former air filter building (former Building 35-7). This site has been investigated and addressed as part of the Middle Mortandad Investigation.	None	2nd Quarter	NA
35-0227	Trailer	Trailer-Office	1966-2008	SWMU 35-014(a) is an area of soil contaminated by laboratory radionuclide stack emissions from a former air filter building (former Building 35-7). This site has been investigated and addressed as part of the Middle Mortandad Investigation.	None	2nd Quarter	NA
46-0342	Metal Building	Gas Test Facility- General Storage	1979-2011	None.	None	2nd Quarter	NA
46-0343	Shed	Shed-Storage	1968-2011	None.	None	2nd Quarter	NA
46-0546	Trailer	Trailer-General Storage	1984-2010	None.	None	2nd Quarter	NA

BUILDINGS TO BE DEMOLISHED DURING SECOND QUARTER 2011- Response to Notice of Disapproval

Technical Area (TA) and building number	Type of Structure	Current and historic uses	Approximate dates of Operation	Solid Waste Management Units (SWMU)/ Areas of Concern (AOC) w/in 50 ft. of footprint	Category	Date /Quarter Demolition expected to begin	Buildings or Fixed Structures identified in previous fiscal year that were not demolished
48-0056	Modular	Transportable-Office	1987-2010	None.	None	2nd Quarter	NA
48-0057	Modular	Transportable-Office	1987-2010	None.	None	2nd Quarter	NA
48-0203	Trailer	Doublewide Trailer-Office	1995-2010	None.	None	2nd Quarter	NA
09-0272	Modular	Transportable-Office	1988-2011	None.	None	2nd Quarter	NA
09-0273	Modular	Transportable-Office	1984-2008	None.	None	2nd Quarter	NA
15-0456	Modular	Transportable-Office	1984-2011	SWMU 15-014(b) consisted of two separate outfalls from drains in Building 15-183. Drains discharging to these outfalls included 13 floor drains, five sinks, and a water fountain. In 1992, the drains from the buildings were connected to the SWSC, and thus there is no longer flow into the outfalls. This SWMU will not be impacted during D&D activities and will be investigated as part of a near future investigation.	None	2nd Quarter	NA
53-29 (annex). Note: There is no specific structure number associated with this three sided structure.	3-sided metal shed, slab foundation	1979 to present. Building 29 will remain a viable facility at TA-53. The small 3-sided metal shed that made up flight path 15(R) was built on the SE side of the building and this structure will be removed.	1979-Present	None.	None	2nd Quarter	NA