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**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau



SUSANA MARTINEZ
Governor

2905 Rodeo Park Drive East, Building 1

Santa Fe, New Mexico 87505-6303

DAVE MARTIN
Cabinet Secretary

JOHN A. SANCHEZ
Lieutenant Governor

Phone (505) 476-6000 Fax (505) 476-6030

Butch Tongate
Acting Deputy Secretary

www.nmenv.state.nm.us

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 1, 2011

George J. Rael, Assistant Manager
Environmental Projects Office
Department of Energy/National
Nuclear Security Administration
Los Alamos Site Office
3747 West Jemez Road, MS A316
Los Alamos, NM 87544

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

**RE: REVIEW
DEMOLITION NOTIFICATION FOR FISCAL YEAR 2012
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-11-MISC**

Dear Messrs. Rael and Graham:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) and the Los Alamos National Security, LLC (LANS) (collectively, the Permittees) *Buildings or Fixed Structures Scheduled to be Demolished During Fiscal Year 2012*, dated September 13, 2011 and referenced by ENV-RCRA-11-0188/LAUR 11-05065. NMED provides following comments.

1. The building and structures numbers listed in the first and the last column for each row in Table (*Demolition Reporting Fiscal Year 2012*) are similar on pages 1 to 3, but different on pages 4 to 7. It is not clear why the building or fixed structure numbers listed in the first and the last column would be different. For example, the first row on page 4 includes discussion on structure 18-0037, and the last column of the first row states that structure 18-0147 was identified but not demolished in previous fiscal year. Clarify the

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relationship of structure 18-0147 with structure 18-0037 and for all structures listed in these two columns on pages 4 to 7 in a replacement table

2. Structure 63-0001 was included in the table entitled *Attachment for FY 2012 Demolition Notification- Building hazardous Material Descriptions* but no description for this structure was provided in the table entitled *Demolition Reporting Fiscal Year 2012*. Revise the table to include information related to the structure 63-0001.

The investigations are not complete at several Solid Waste Management Units (SWMUs) located within 50 ft. of the buildings proposed for demolition. Several of these SWMUs are or may be proposed for further investigation. Some of the proposed sampling locations are adjacent to the buildings scheduled for demolition. The demolition activities must be documented to ensure that there are no adverse impacts to SWMUs where investigations are not complete.

Pursuant to Section 1.17.3 of the Los Alamos National Laboratory Hazardous Waste Permit (Permit), NMED hereby requires notice of demolition 30 days prior to the commencement of demolition activities, for the following structures:

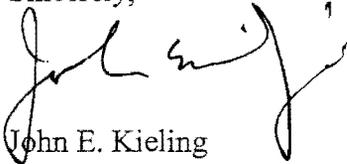
- 03-0058, Cooling Tower
- 03-0285, Cooling Tower
- 15-0456, Transportable Wood Lt. Frame
- 18-0028, Steel Braced Frame
- 18-0030, Concrete Sheer Walls
- 18-0031, Concrete Sheer Walls
- 18-0037, Reinforced Concrete Structures
- 18-0127, Steel Frame w/Concrete Sheer Walls
- 18-0187, Premanufactured Metal Tower
- 18-0188, Premanufactured Metal Tower
- 18-0189, Cast Concrete
- 18-0190, Reinforced Masonry Structure
- 18-0270, Steel Moment Frame
- 22-0001, Metal and Wood Framed Structure
- 35-0224, Trailer-Wood Lt. Frame
- 35-0226, Trailer-Wood Lt. Frame
- 35-0227, Trailer-Wood Lt. Frame

NMED notes that a notice for demolition of some of the structures listed above was sent on October 6, 2011. The Permittees must provide a copy of the demolition reports, if prepared, to NMED within 30 days after the reports are completed in accordance with Section 1.17.3 of the Permit. The response to the comments included in this letter is due no later than November 30, 2011.

Messrs. Rael and Graham
November 1, 2011
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Please contact Neelam Dhawan of my staff at (505) 476-6042 should you have any questions.

Sincerely,



John E. Kieling
Acting Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
S. Yanicak, NMED DOE OB, MS J993
T. Skibitski, NMED DOE OB
L. King, EPA 6PD-N
P. Maggiore, DOE-LASO, MS A316
G. Turner, DOE-LASO, MS A316
M. Haagenstad, ENV-RCRA, MS K404

File: LANL, Building Demolition Activities for FY 2012.