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Date: October 24, 2011
Refer To: ENV-RCRA-11-0234
LAUR: 11-05876

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



Dear Mr. Kieling:

SUBJECT: RESPONSE TO THE REQUEST FOR NOTIFICATION OF 4TH QUARTER CALENDAR YEAR (CY) 2011 DEMOLITION ACTIVITIES FROM THE NEW MEXICO ENVIRONMENT DEPARTMENT-HAZARDOUS WASTE BUREAU (NMED-HWB)

The purpose of this letter is to respond to the request from the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) to provide notification on the following buildings and structures identified in the HWB-LANL-11-MISC letter dated October 5, 2011.

On October 6, 2011, the following buildings were reported to the NMED-HWB in the letter Response to New Mexico Environment Department (NMED), letter of August 12, 2011 Requiring 30 day Notification on Demolition Activities for Buildings Identified in 3rd Quarter 2011. In addition, the buildings were also reported to NMED on the dates provided in the following table:

Table with 3 columns: Technical Area and Building, Description, Date(s) reported previously to NMED-HWB. Rows include buildings 03-0058 and 03-0285, both Cooling Towers, with dates from July 18, 2011 to September 13, 2011.

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<b>Technical Area and Building</b>	<b>Description</b>	<b>Date(s) reported previously to NMED-HWB</b>
15-0456	Transportable Wood Lt. Frame	March 29, 2011 (2 <sup>nd</sup> Qtr 2011) July 18, 2011 (3 <sup>rd</sup> Qtr 2011) September 14, 2011 (4 <sup>th</sup> Qtr 2011) September 13, 2011 (FY 2012)
22-0001	Metal and Wood Framed Structures	July 18, 2011 (3 <sup>rd</sup> Qtr 2011) September 14, 2011 (4 <sup>th</sup> Qtr 2011) September 14, 2011 (4 <sup>th</sup> Qtr 2011) September 13, 2011 (FY 2012)
35-0224	Trailer	August 19, 2008 Email to J. Kieling March 29, 2011 (2 <sup>nd</sup> Qtr 2011) July 18, 2011 (3 <sup>rd</sup> Qtr 2011) September 14, 2011 (4 <sup>th</sup> Qtr 2011) September 13, 2011 (FY 2012)
35-0226	Trailer	August 19, 2008 Email to J. Kieling March 29, 2011 (2 <sup>nd</sup> Qtr 2011) July 18, 2011 (3 <sup>rd</sup> Qtr 2011) September 14, 2011 (4 <sup>th</sup> Qtr 2011) September 13, 2011 (FY 2012)
35-0227	Trailer	August 19, 2008 Email to J. Kieling March 29, 2011 (2 <sup>nd</sup> Qtr 2011) July 18, 2011 (3 <sup>rd</sup> Qtr 2011) September 14, 2011 (4 <sup>th</sup> Qtr 2011) September 13, 2011 (FY 2012)

The buildings in the table below have previously been notified to NMED on the dates noted in the last column:

<b>Technical Area and Building</b>	<b>Description</b>	<b>Date(s) reported previously to NMED-HWB</b>
18-0028	Steel Braced Frame	September 22, 2008 (FY 2009) March 29, 2011 (2 <sup>nd</sup> Qtr 2011) September 14, 2011 (4 <sup>th</sup> Qtr 2011) September 13, 2011 (FY 2012)
18-0030	Concrete Sheer Walls	September 14, 2011 (4 <sup>th</sup> Qtr 2011)
18-0031	Concrete Sheer Walls	September 22, 2008 (FY 2009) March 29, 2011 (2 <sup>nd</sup> Qtr 2011) September 14, 2011 (4 <sup>th</sup> Qtr 2011) September 13, 2011 (FY 2012)

Technical Area and Building	Description	Date(s) reported previously to NMED-HWB
18-0147	CMU Office Building	September 22, 2008 (FY 2009) March 29, 2011 (2 <sup>nd</sup> Qtr 2011) September 14, 2011 (4 <sup>th</sup> Qtr 2011) September 13, 2011 (FY 2012)
18-0189	Cast Concrete	September 22, 2008 (FY 2009) March 29, 2011 (2 <sup>nd</sup> Qtr 2011) September 14, 2011 (4 <sup>th</sup> Qtr 2011) September 13, 2011 (FY 2012)

The NMED-HWB had concerns that the information provided within the Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) was incomplete at several of the locations within 50 ft. of buildings to be demolished. The table was inadvertently cut off on the SWMUs/AOCs information when printing to a pdf file for TA-18-0030. The complete description is as follows:

***SWMU 18-001(c)** consists of a sump, equipped with two sump pumps and a drain, located in the basement of building 18-30. Building 18-30 is 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 within building 18-30 formerly drained to the sump. The drains were diverted to the TA-18 sanitary sewer line in the fall of 1992. By the summer of 1994, all of the drains associated with building 18-30 were diverted into the sanitary sewer line. 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. The outfall is within approximately 20 ft of the main drainage channel in Pajarito Canyon. **SWMU 18-003(f)** is an inactive septic system that includes an inlet line, a septic tank (structure 18-41), a discharge line, and a drain field. The septic system received sanitary waste and photochemical laboratory waste 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. Historical documents indicate that a manhole, a settling pit with associated drainlines, and an outfall may have been associated with SWMU 18-003(f), but they were not located during the 1993 RFI investigation. **SWMU 18-004(a)** consists of a 3-in.-diameter × approximately 50-ft-long stainless-steel industrial waste line located 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 was designed to receive radioactively contaminated liquid waste from building 18-30 (LANL 1993, 015310, p. 5-13). The 1990 SWMU report states that the waste line received radioactively contaminated liquid waste from building 18-30. During interviews conducted for the RFI work plan, former personnel from building 18-30 indicated that sealed radioactive sources, detectors, and reactor-fuel elements were the only radioactive materials present in building 18-30, and no radioactive liquids were ever present. The interviews also indicated that while no radioactive waste entered the waste line, some chemical wastes (primarily acids and cleaning solvents) did. 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. Because no information regarding the removal of the waste line was found, it is assumed that the line remains buried in place. **SWMU 18-004(b)** consists consists of an area of potential soil contamination associated with a subsurface concrete containment pit (structure 18-38) that measures 4 ft wide × 9 ft long × 8 ft high and is located at TA-18 on the west side of building 18-30. 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 × 6-in.-high sump was built into the floor of the pit, possibly to catch any overflow from the tanks.*

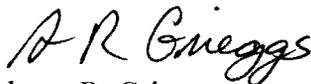
*Whenever the tanks became full, they were taken out for waste removal and cleaning and then returned to service. The 1990 SWMU Report states that the waste line received radioactively contaminated liquid waste from building 18-30. During interviews conducted for the RFI work plan, former personnel from building 18-30 indicated that sealed radioactive sources, detectors, and reactor-fuel elements were the only radioactive materials present in building 18-30, and no radioactive liquids were ever present. The interviews also indicated that while no radioactive waste entered the tanks, some chemical wastes (primarily acids and cleaning solvents) did. 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. Figures depicting these SWMUs and the sources of the information above, can be found in Investigation Work Plan for Lower Pajarito Canyon Aggregate Area, Revision 1 (LA-UR-10-7635), that was submitted to the NMED-HWB in November 2010 by letter.*

The demolition activities for TA-18-0030 will be documented to ensure that no adverse impacts to SWMUs where investigations are not complete.

Pursuant to Section 1.17.3 of the Los Alamos Laboratory Hazardous Waste Permit, LANL hereby gives notification of demolition activities of the above buildings. Should a demolition report be prepared for any of the buildings included herein, LANL will provide a copy of such report to the NMED-HWB within 30 days after the final report is written.

Please contact Mark Haagenstad of LANS at (505) 665-2014 or [mph@lanl.gov](mailto:mph@lanl.gov) or Gene Turner with DOE/NNSA at (505) 667-5794 or [gturner@doeal.gov](mailto:gturner@doeal.gov) should you have any questions.

Sincerely,



Anthony R. Grieggs  
Group Leader  
Water Quality & RCRA Group  
Los Alamos National Laboratory

Sincerely,



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

ARG:GET:CH/lm

Cy: Laurie King, USEPA/Region 6, Dallas TX  
George Rael, LASO-EO, A906  
Gene Turner, LASO-EO, A316  
Carl A. Beard, PADOPS, w/o enc., A102  
J. Chris Cantwell, ADESHQ, w/o enc., K491  
Mark Haagenstad, ENV-RCRA, K404, (E-File)  
Catherine Juarez, ENV -RCRA, K404, (E-File)  
Patricia Gallagher, ENV-ES, J978  
Alison Dorries, WES-DO, K491

Mr. John E. Kieling  
ENV-RCRA-11-0234

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October 24, 2011

Cy (continued):

Jim Jones, SP-DO, J590

Ken Schlindwein, IP-DO, M895

Janet Harry, IP-SDFD, M895

Darrik Stafford, SP-DISP, J590

Ian Albright, PMF-FUNCT, J590

ENV-DO File, K404 (E-File)

ENV -RCRA File, M704

IRM-RMMSO (U1101902), A150