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*Environmental Protection Division  
Water Quality & RCRA Group (ENV-RCRA)*  
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Date: January 24, 2012  
Refer To: ENV-RCRA-12-0018  
LAUR: 12-00213

Mr. John 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: LOS ALAMOS NATIONAL LABORATORY RESPONSE TO HWB-LANL-11-MISC – RESPONSE TO REVIEW OF DEMOLITION NOTIFICATION FOR FIRST QUARTER CY 2012**

Los Alamos National Laboratory (LANL) has received comments from the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) review of comments from LANL letter, dated November 1, 2011.

The Permittees have removed the duplicated structure 18-0297 from the table. An updated and corrected table is attached.

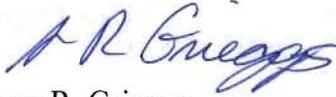
The Permittees understand NMED-HWB's concern regarding demolition at SWMUs and AOCs where investigations are not complete. The Permittees acknowledge the importance of this concern and will continue to address it by performing the following:

- The Permittees will document the demolition activities and ensure that there are no impacts to the sampling locations and depths proposed in the approved work plans for the buildings identified in the first quarter calendar year 2012 demolition notification.
- The Permittees will provide a copy of demolition reports, if prepared, to the NMED-HWB within 30 days after the reports are completed in accordance with Section 1.17.3 of the Permit.



If you have questions or comments concerning this submittal, please contact Mark Haagenstad (LANS, LLC) at (505) 665-2014.

Sincerely,



Anthony R. Grieggs  
Water Quality & RCRA Group (ENV-RCRA)

ARG:CJ/lm

Enclosure: a/s

Cy: Laurie King, USEPA/Region 6, Dallas TX, w/enc.,  
George Rael, LASO-EO, w/enc., A906  
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Ian Albright, MNFRFCT-DO, w/enc., J590  
Taylor Valdez, ENV-DO, w/o enc., K404, (E-File)  
Linda Salazar, ADESH, w/o enc., K491, (E-File)  
ENV-RCRA File, w/enc., M704  
IRM-RMMSO File, (U1200002), w/enc., A150

LA-UR-12-00213

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<i>Title:</i>	LOS ALAMOS NATIONAL LABORATORY RESPONSE TO HWB-LANL-11-MISC – RESPONSE TO REVIEW OF DEMOLITION NOTIFICATION FOR FIRST QUARTER CY 2012
<i>Author(s):</i>	Catherine Juarez
<i>Intended for:</i>	New Mexico Environment Department- Hazardous Waste Bureau



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Demolition Notification  
1st Quarter 2012 (UPDATED)  
(January 1 through March 31, 2012)

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
03-0058	Cooling tower	Cooling tower	1951-1985	Consolidated Unit 03-012(b)-00 consists of soil contamination from operational releases [SWMU 03-012(b)], a holding tank [SWMUs 03-014(q)], and two permitted outfalls [SWMUs 03-045(b) and 03-045(c)]. The SWMUs within this consolidated unit are associated with the TA-03 power plant (building 03-22) operations. SWMU 03-012(b) is soil contamination from operational releases, including cooling tower drift; SWMU 03-014(q) is a cooling-water holding tank; and SWMUs 03-045(b) and 03-045(c) are permitted outfalls that discharge into a small tributary of Sandia Canyon directly south of the steam power. The investigation for this is ongoing. Figures that depict these SWMUs and the source for the information above, can be found in <i>Investigation Report for Upper Sandia Canyon Aggregate Area</i> (LA-UR-10-3256), which was submitted to NMED-HWB in May 2010 by letter.		1st Quarter 2012	N/A
03-0285	Cooling tower	Cooling tower	1951-1985	Consolidated Unit 03-012(b)-00 consists of soil contamination from operational releases [SWMU 03-012(b)], a holding tank [SWMUs 03-014(q)], and two permitted outfalls [SWMUs 03-045(b) and 03-045(c)]. The SWMUs within this consolidated unit are associated with the TA-03 power plant (building 03-22) operations. SWMU 03-012(b) is soil contamination from operational releases, including cooling tower drift; SWMU 03-014(q) is a cooling-water holding tank; and SWMUs 03-045(b) and 03-045(c) are permitted outfalls that discharge into a small tributary of Sandia Canyon directly south of the steam power. The investigation for this is ongoing. Figures that depict these SWMUs and the source for the information above, can be found in <i>Investigation Report for Upper Sandia Canyon Aggregate Area</i> (LA-UR-10-3256), which was submitted to NMED-HWB in May 2010 by letter.		1st Quarter 2012	N/A

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03-0187	Cooling tower	Cooling tower	1964-2011	<b>SWMU 03-045(h)</b> is the outfall area at the north perimeter of the Sigma Complex security fence, approximately 50 ft north of a cooling tower (structure 03-187). Treated cooling water and stormwater are discharged at the outfall. The area at the outfall pipe is about 3 ft wide x 6 ft long. Effluent drains into a corrugated metal storm drainpipe that trends northeast and east of structure 03-187 where it combines with more stormwater runoff from surrounding areas. The investigation for this is ongoing. Figures that depict this SWMU and the source for the information above, can be found in Investigation Report for Upper Mortandad Canyon Aggregate Area (LA-UR-10-2046), which was submitted to NMED-HWB in April 2010 by letter.		1st Quarter 2012	N/A
35-0033	Cooling tower	Cooling tower	1967-2011	<b>SWMU 35-009(d)</b> is the site of an abandoned 1600-gal. septic tank and associated leach field at the northeast corner of Ten Site Mesa. The leach field covers an area of approximately 1800 sq ft. The tank was pumped out, filled with concrete, and left in place in 1996. <b>SWMU 35-016(p)</b> is an outfall established in 1968 to discharge noncontact cooling water from building 35-27 and stormwater from roof drains. The investigation of these sites has been completed. Figures that depict these SWMUs and the source for the above information can be found in the Sampling and Analysis Plan for the Middle Mortandad/Ten Site Aggregate (LA-UR-02-0244), which was submitted in NMED-HWB in March 2002 by letter and the Investigation Report for the Middle Mortandad/Ten Site Aggregate (LA-UR-08-0336), which was submitted to NMED-HWB in February 2008 by letter.		1st Quarter 2012	N/A

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03-0251	Shed	Water Valve House	1965-2012	Consolidated Unit 03-012(b)-00 consists of soil contamination from operational releases [SWMU 03-012(b)], a holding tank [SWMUs 03-014(q)], and two permitted outfalls [SWMUs 03-045(b) and 03-045(c)]. The SWMUs within this consolidated unit are associated with the TA-03 power plant (building 03-22) operations. SWMU 03-012(b) is soil contamination from operational releases, including cooling tower drift; SWMU 03-014(q) is a cooling-water holding tank; and SWMUs 03-045(b) and 03-045(c) are permitted outfalls that discharge into a small tributary of Sandia Canyon directly south of the steam power. The investigation for this is ongoing. Figures that depict these SWMUs and the source for the information above, can be found in <i>Investigation Report for Upper Sandia Canyon Aggregate Area</i> (LA-UR-10-3256), which was submitted to NMED-HWB in May 2010 by letter.		1st Quarter 2012	N/A
18-0037	Reinf. Concrete Structure	Guard Station	1953-2007	AOC 18-010(d) is an outfall at TA-18 that receives discharge in the form of sheet flow from a storm drainage collection area that drains the paved area northeast of building 18-0037. The outfall discharges to a flat graveled and grassy area southeast of building 18-0037 and west of building 18-0258. The discharge point is approximately 100 ft north of the stream channel in Pajarito Canyon. The date this outfall became operational is unknown, but it is likely that the outfall has been operational from the time building 18-0037 was constructed in 1951. Figures that depict these AOC and the source for the information above, can be found in <i>Investigation Work Plan (IWP) for Lower Pajarito Canyon Aggregate Area, Revision 1</i> (LA-UR 10-7634), which was submitted to NMED-HWB on November 19, 2010 by letter.		1st Quarter 2012	N/A
18-0127	Steel Frame w/ Conc. Shear walls	Accelerator Building	1967-2009	None	Asbestos, RCRA metals, VOCs	1st Quarter 2012	N/A
18-0227	Steel Frame w/ Conc. Shear walls	Lab	1990-2007	None	RCRA metals, VOCs, SVOCs, TPH, PCBs	1st Quarter 2012	N/A
18-0270	Steel Moment Frame	Guard Station	1990-2011	None	Lead	1st Quarter 2012	N/A

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18-0297	Other	Warehouse	1997-2008	<p><b>SWMU 18-005(a)</b> consists of an area of potentially contaminated soil associated with a former magazine (structure 18-15) at TA-18 that was used from 1945 until it was demolished in 1977. The magazine was a small, round, dirt-bermed wooden structure constructed at grade and located west of building 18-297. The magazine originally stored HE for firing-site activities conducted at SWMU 18-002(a). Uranium and beryllium oxide were also stored in the magazine for nuclear criticality studies conducted from approximately 1946 to 1955. The former location of structure 18-15 is not currently visible, and the berm surrounding the former location of the magazine is no longer present. Figures that depict these AOC and the source for the information above, can be found in Investigation Work Plan (IWP) for Lower Pajarito Canyon Aggregate Area, Revision 1 (LA-UR 10-7634), which was submitted to NMED-HWB on November 19, 2010 by letter.</p>		1st Quarter 2012	N/A
18-0187	Premanufactured Metal Tower	Guard Station	1986-2009	<p><b>SWMU 18-002(b)</b> is an inactive firing site at TA-18 in Three mile Canyon near the present location of building 18-0032 (Kiva 2). The firing site was used from 1944 to 1945. The site consisted of a 2 ft-long x 2 ft-wide x 2-ft-deep firing chamber (former structure 18-0004) constructed from 1-in.-thick steel and an aboveground armored bunker (structure 18-0005), commonly called a "battleship," used to protect shot instrumentation. The top of the firing chamber was open and set flush with the ground west of structure 18-0005. A ground-level wooden structure (former structure 18-0006), located east of structure 18-0005, was the battery building for the firing site cable conduit system. It contained racks of lead-acid batteries. Structure 18-0004 was removed in 1945, structure 18-0006 was dismantled in 1951, and structure 18-0005 remains. Three additional firing points further upcanyon are associated with SWMU 18-002(b). Firing Point C (now beneath building 18-0032) was 51 ft west of structure 18-0005 and on its midline. Firing Point G, located at the southeast corner of the current storage building 18-0122, was 145 ft west of structure 18-0005 on its midline. Firing Points C and G were used in firing operations involving smaller charges than the third firing point. The third firing point, Medium Firing Point, was built to handle HE charges of up to 2 tons. It was located 478 ft west of structure 18-0005 and 15 ft south of its midline. <b>AOC C-00-012</b> consists of the Three mile Canyon system. Figures that depict this SWMU and AOC and the source for the information above, can be found in <i>Investigation Work Plan (IWP) for Lower Pajarito Canyon Aggregate Area, Revision 1 (LA-UR 10-7634)</i>, which was submitted to NMED-HWB on November 19, 2010.</p>	Lead	1st Quarter 2012	N/A

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18-0188	Premanufactured Metal Tower	Guard Station	1984-2009	None	Lead	1st Quarter 2012	N/A
18-0190	Reinf. Masonry Structure	Guard Station	1986-2009	None	TPH, PCBs	1st Quarter 2012	N/A
18-0277	Morgan Shed	Storage	1994-2008	None		1st Quarter 2012	N/A
18-0129	Cast Concrete	Reactor Sub-Assembly Building	1962-2007	AOC 18-012(c) consists of an inactive sump and two drainlines from building 18-141. One drainline is a 4-in. cast-iron pipe attached to the floor drain of a sump located in the pit of building 18-141. This drainline exits the south side of the building and discharges through an outfall that empties into a former drainage ditch approximately 80 ft east of building 18-141. The second drainline is a 3-in. cast-iron pipe connected to floor drains and sinks in building 18-141. This drainline exits the northeast side of the building and discharges through an outfall that empties into a dry well sump approximately 50 ft east of building 18-141. Figures that depict these AOC and the source for the information above, can be found in Investigation Work Plan (IWP) for Lower Pajarito Canyon Aggregate Area, Revision 1 (LA-UR 10-7634), which was submitted to NMED-HWB on November 19, 2010 by letter.	TPH, PCBs, VOCs, RCRA Metals	1st Quarter 2012	N/A
18-0141	Reinf. Masonry Structure	Ultra-Sonic Cleaning Building	1966-2007	AOC 18-012(c) consists of an inactive sump and two drainlines from building 18-141. One drainline is a 4-in. cast-iron pipe attached to the floor drain of a sump located in the pit of building 18-141. This drainline exits the south side of the building and discharges through an outfall that empties into a former drainage ditch approximately 80 ft east of building 18-141. The second drainline is a 3-in. cast-iron pipe connected to floor drains and sinks in building 18-141. This drainline exits the northeast side of the building and discharges through an outfall that empties into a dry well sump approximately 50 ft east of building 18-141. Figures that depict these AOC and the source for the information above, can be found in Investigation Work Plan (IWP) for Lower Pajarito Canyon Aggregate Area, Revision 1 (LA-UR 10-7634), which was submitted to NMED-HWB on November 19, 2010 by letter.	VOCs, SVOCs, PCBs, Be, Asbestos, RCRA Metals	1st Quarter 2012	N/A
03-0373	Metal Guard House	Guard Station	1971-2011	None		1st Quarter 2012	N/A
03-0097	Wood Light Frame	Guard Station	1955-2011	None		1st Quarter 2012	N/A

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03-1664	Shed	Hydraulic Pump Enclosure	1986-2012	None	TPH, PCBs	1st Quarter 2012	N/A
03-2260	Metal Shade Structure	Badge Reader Shelter	1995-2012	AOC 03-010(c) is the site of a hydraulic pump housed in a metal shed north of Building TA-03-0216. The pump was mounted on a concrete pad elevated about 6 in. above the ground and enclosed in a small sheet-metal housing. It was removed between December 1990 and August 1991. The ground around the pad is landscaped with gravel-covered plastic sheeting. Operating practices included the placement of drip pans under the pump to catch any leakage. Inspection of the site by Laboratory personnel during preparation of the OU 1114 RFI Work Plan revealed no visual evidence of any seal oil spills, either on the concrete base or on the ground around the base. EPA confirmed approval of no further action for this site in a January 21, 2005 letter to NMED.		1st Quarter 2012	N/A
53-1138	Shed made of wood and metal	Shed was historically used as a detector building. There is no current use and has been inactive for approximately 8 years.	1989 - 2004	None		1st Quarter 2012	N/A