



SUSANA MARTINEZ  
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JOHN A. SANCHEZ  
Lieutenant Governor

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NEW MEXICO  
ENVIRONMENT DEPARTMENT



ENTERED

*Hazardous Waste Bureau*

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DAVE MARTIN  
Cabinet Secretary

RAJ SOLOMON, P.E.  
Deputy Secretary

Reading file  
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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 30, 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  
RESPONSE TO NOTICE OF DISAPPROVAL  
DEMOLOITION 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 received the United States Department of Energy (DOE) and the Los Alamos National Security, LLC (LANS) (collectively, the Permittees) *Response to Notice of Disapproval Notification of Additional Demolition Activities for Second Quarter 2011 (LA-UR 11-01562)*, dated May 16, 2011 and referenced by ENV-RCRA-11-086. This response was submitted to address NMED's Notice of Disapproval (NOD) issued on April 14, 2011.

Buildings proposed to be demolished at Technical Area 18 include 18-0028, 18-0030, 18-0031, 18-0147, and 18-0189. Several Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) are located in the vicinity of these buildings. The Investigation Work Plan for Lower Pajarito Canyon Aggregate Area (IWP) that includes investigation of these sites was approved on

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December 8, 2010. The field work is scheduled to begin in July 2011 and the associated investigation report must be submitted to NMED by July 31, 2012. Several sampling locations proposed in the IWP are adjacent to the buildings scheduled for demolition. The Permittees must document the demolition activities to ensure that there are no impacts to the sampling locations and depths proposed in the approved IWP. Additionally, in the IWP, characterization of some of these sites was deferred until demolition of these buildings was complete. After demolition of the building is completed, the Permittees will now be able to complete characterization of these sites and include the results in the investigation report.

For building 18-0030, a reference to Figure 2.13-1 is provided for SWMU 18-004(b) under the column heading SWMU/AOC within 50 ft of the footprint. However, no figures are attached with the response. In future submittals, include a figure depicting location of these buildings in relation to SWMU/AOCs located within 50 feet of the building footprint to facilitate review of the document. The Permittees must also include references to the document used as a source of information on SWMUs/AOCs located within 50 feet of the building footprint.

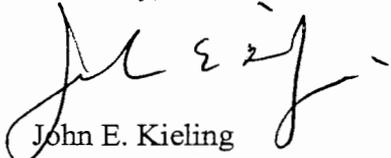
Pursuant to Section 1.17.3 of the Los Alamos National Laboratory Hazardous Waste Permit (Permit), NMED hereby requires notice of demolition 30 days prior to the commencement of demolition activities, for the following structures:

- TA-18-0028, Warehouse Metal Building
  - TA-18-0030, Office Buildings and Machine Shops
  - TA-18-0031, Utility and other Service Buildings
  - TA-18-0147, Office Buildings
  - TA-18-0189, Communications/Control Center
- The Permittees must provide a copy of the demolition report, if prepared, to NMED within 30 days after the report is written in accordance with Section 1.17.3 of the Permit.

Messrs. Rael and Graham  
June 30, 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  
D. Comeau, NMED HWB  
S. Yanicak, NMED DOE OB, MS J993  
T. Skibitski, NMED DOE OB  
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P. Maggiore, DOE-LASO, MS A316  
G. Turner, DOE-LASO, MS A316  
A. Grieggs, ENV-RCRA, MS K490  
M. Haagenstaad, ENV-RCRA, MS K490  
J. McCann, EP-CAP, MS M992

File: LANL, Building Demolition Activities for 2nd Q, 2011.