

TA-16

James Barzi/File



State of New Mexico
ENVIRONMENT DEPARTMENT

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April 12, 2002

Elizabeth Withers
NEPA Compliance Officer
Office of Los Alamos Site Operations
528 35th Street
Los Alamos, N.M. 87544

FAX: (505) 667-9998

Dear Ms. Withers:

RE: PREDECISIONAL DRAFT ENVIRONMENTAL ASSESSMENT OF THE PROPOSED TA-16 ENGINEERING COMPLEX REFURBISHMENT AND CONSOLIDATION AT LOS ALAMOS NATIONAL LABORATORY, LOS ALAMOS, NEW MEXICO; DOE/EA-1407; MARCH 25, 2002

This transmits New Mexico Environment Department (NMED) staff comments concerning the above-referenced Predecisional Draft Environmental Assessment (PDEA).

HAZARDOUS WASTE

Because there are several solid waste management units (SWMUs) in the vicinity of this proposed project continued coordination with the Environmental Restoration (ER) Project is important. Coordination should take place to avoid negative impacts to SWMU investigations and to provide for worker safety and health during construction activities. Every effort should be made to facilitate current and future ER sampling at the site. Efforts must be made to avoid impacts to adjacent SWMUs from roof drains, parking lot run off, etc.

Based on available information, no unacceptable risk is anticipated at this time, as long as the total cumulative exposure to potential receptors is in compliance with applicable regulations.

AIR QUALITY

The proposed project will be located in Los Alamos County. As stated in the PDEA, this area is currently considered to be in attainment with all state and national ambient air quality standards.

The Environmental Assessment should include a better description of the demolition dust-related impacts. How demolition is performed will impact the amount of dust generated by



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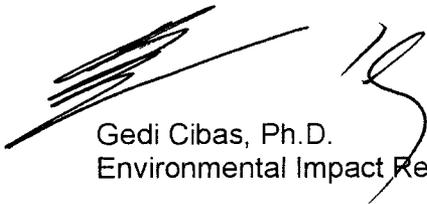
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demolition. A description of building demolition practices and dust control practices for demolition will allow an analysis of the air quality during demolition. Links to information on Best Available Control Measures for dust control and fugitive dust control techniques and businesses can be found at http://www.nmenv.state.nm.us/aqb/open_house.html.

Compliance with NMED Air Quality Bureau requirements concerning asbestos removal is required. In addition to packaging and disposal of asbestos, LANL must meet the requirements for asbestos demolition and removal. Advance notification to NMED is required. For additional information regarding these requirements, please contact Royce Wyrick or Ron Duffy in Santa Fe at (505) 827-1494. Additional information regarding asbestos can be found on our web site at <http://www.nmenv.state.nm.us/aqb/asbestos.html>.

We appreciate the opportunity to comment on this document.

Sincerely,



Gedi Cibas, Ph.D.
Environmental Impact Review Coordinator

NMED File No. 1578ER