

TA16



Environmental Stewardship
Solid Waste Regulatory Compliance
P.O. Box 1663, Mail Stop K490
Los Alamos, New Mexico 87545
505-667-0666/Fax 505-667-5224

Date: January 30, 2006
Refer To: ENV-SWRC:06-008

John Young
Corrective Action Section
RCRA Permits Management Program
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Rubble Generated from the Demolition of TA-16-340 Timeline

Dear Mr. Young:

The purpose of this letter is to transmit the final piece of information LANL agreed to provide in our last meeting. The attached timeline provides the key points and activities that took place leading up to the disposition of the TA-16-340 rubble on Sigma Mesa and actions taken subsequent to its disposition.

If you should have any questions concerning this letter or its attachment please feel free to contact either Gene Turner at (505)667-9754 or myself at (505)667-0633.

Sincerely,

Jack Ellvinger
Deputy Group Leader
Solid Waste Regulatory Compliance Group

JE/tag

Attachment (1)

- CC: G. Turner, DOE
- A. Grieggs, ENV-SWRC
- J. Jones, PM-IP
- D. McInroy, ENV-RS
- E. Louderbough, OLC

SWRC File



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Timeline for TA-16-340s Line Decontamination and Decommissioning Project

January 2004: Subject Matter Experts commented on the draft excavation permit for demolition activities at the TA-16-340 complex.

Early January 2005: Subject Matter Experts comment on a revised draft excavation permit specifying the required characterization and management activities for demolition debris. The plan called for sumps to be left in place.

January 16, 2005: The separation of metal from concrete is completed and trucking of concrete to Sigma Mesa is begun. This was done in order to reduce turn-around time. Crushing of the concrete was proposed with the intention of recycling it.

February 22, 2005: ENV-ECO prohibits concrete crushing operations on Sigma Mesa from March 1, 2005 through August 31, 2005 because a pair of Mexican Spotted Owls was observed to be nesting in the adjacent canyon.

February thru March 2005: Subject Matter Experts request complete characterization information for debris through the waste profile form process.

June 30, 2005: Review of an excavation permit to crush and recycle the concrete for the TA-16-340 demolition is requested. Subject Matter Experts require complete characterization data for all rubble to be crushed.

August 15, 2005: The analytical results of the single composite sample taken from the concrete rubble staged at Sigma Mesa are reviewed internally. The analytical results show hits for barium (0.379 mg/L TCLP) and naphthalene (0.41 mg/kg). Based on these detects and the fact that several PRSs were located at the TA-16 340 Complex it is determined that further sampling and analysis is required to fully characterize the rubble pile on Sigma Mesa.

August 15 thru 30, 2005: Several internal meetings are held to gather and compile the facts of exactly what debris material went to Sigma Mesa. It was determined that PRS debris was sent to Sigma Mesa along with the demolition debris. This was a deviation from LANL's approved work authorization for these activities.

August 31, 2005: LANL and NNSA representatives contact NMED and notify David Cobrain of the Sigma Mesa issue and what is proposed for sampling and analysis.

September thru October 2005: Following an internal review, LANL implements actions to ensure future demolition materials are characterized and managed properly, including:

- An Environmental Engineer is deployed to PM-IP from SWRC to assist them in waste characterization and waste management issues.
- PM-IP and ENV-SWRC are developing a policy for handling of D&D debris including planning, identification, characterization and disposition of that debris.
- Proposal of changes to PR-ID (ES&H ID) and Excavation Permit Review process to insure thorough review and physical joint walk downs of proposed sites.

September 2-7, 2005: Staged concrete on Sigma Mesa from demolition of the TA-16-340 is sampled in accordance with proposal made to NMED.

September 14, 2005: Preliminary waste characterization data received.

October 6-18, 2005: Qualified data package received and reviewed.

November 17, 2005: LANL and NNSA meet with David Cobrain and John Young of NMED to discuss sampling data and issues surrounding the rubble pile on Sigma Mesa.

December 9, 2005: Analytical data and maps were submitted to NMED for their review.