

Annotated chronology

- **April 10, 2007.** The Settlement Agreement was signed.
 - Paragraph 21.b of Section III (Notice of Demolition Activities) requires the Permittees to submit on or before September 30 of each year an annual list of buildings and other fixed structures that may contain hazardous material scheduled to be demolished in the following fiscal year (October 1 through September 30). This requirement began in 2007 and continues until the effective date of the final renewed hazardous waste permit.
 - Paragraph 21.c requires the Permittees to update the annual list on or before the last day of each quarter (December 31, March 30, and June 30) to include any additional buildings and other fixed structures that may contain hazardous material scheduled for demolition or shall notify the NMED in writing that no such additional demolitions have been scheduled.
 - Paragraph 21.d requires the list to be presented in the form of a table and describes the general information that must be included, to the extent that it is available at the time it is submitted. One of the seven general information requirements is “the date, if available, or the quarter in which the demolition is scheduled to begin or anticipated to begin”.
 - Paragraph 21.e states that the NMED may identify in writing those buildings or fixed structures for which it requires notice. For each identified building or fixed structure the Permittees must give the NMED a notice of commencement of demolition at least 30 days prior to the start of demolition.
 - Paragraph 21.f requires the Permittees to provide the NMED a copy of the demolition completion report, if such a report is prepared by the Permittees, within 30 days after the final report is written.
 - Paragraph 21.f acknowledges that the scope and schedule of the demolition activities identified in the lists provided to the NMED under Paragraph 21 are not subject to approval by the NMED unless otherwise provided by law.

- **June 22, 2009.** The Permittees submitted the third quarter 2009 schedule of demolition activities to the NMED. This schedule included Buildings 21-167 and 21-370, both of which were slated for demolition in the 3rd quarter. The Permittees did not receive a request from NMED for a 30-day notice of demolition for either Building 21-167 or 21-370.
- **September 22, 2009.** The Permittees submitted the Fiscal Year 2010 list of buildings or fixed structures scheduled to be demolished to NMED, which postponed the projected demolition of Buildings 21-167 and 21-370 to the 2nd quarter of 2010.
- **September and Early October 2009.** The Permittees revised the demolition schedule for buildings at TA-21 because of the availability of stimulus money.
- **September 29, 2009.** The Permittees demolished Building 21-370.
- **October 7, 2009.** Date of NMED letter to the Permittees, requesting 30-day notice for a list of buildings, including Buildings 21-167 and 21-370.

- **October 8, 2009.**
 - The Permittees commenced demolition of Building 21-167 at 8:00 am.
 - Mr. Gregory, Federal Project Director for the Los Alamos Site Office (LASO) received NMED's October 7, 2009 letter at 9:29 am.
- **October 27, 2009.** Jack Ellvinger called Kathryn Roberts at NMED to inform her that Buildings 21-167 and 21-370 were demolished on October 8, 2009 and September 29, 2009, respectively.
- **October 29, 2009.** The Permittees submitted a letter to NMED that included a brief description of the two buildings that were demolished.
- **November 4, 2009.** The Permittees received the letter from NMED requesting information on building demolition activities at TA-21, specifically Buildings 21-167 and 21-370.

The annual list takes a considerable amount of time to compile (approximately two months) and requires input from several departments at the Laboratory. When work on the September 2010 fiscal year list began stimulus funding was not a certainty and budget constraints lead to the proposed postponement of the demolition of Buildings 21-167 and 21-370 from the 3rd quarter of FY 2009 until the 2nd quarter of FY 2010. When the stimulus money became a certainty the schedule for these buildings was accelerated. As described in the annotated chronology above, the demolition of Buildings 21-167 and 21-370 was completed before the Permittees' program management received the Department's request for 30-day notice. Please know, however, that the Permittees are committed to complying fully with the Settlement Agreement.

It would be helpful to us if you would provide a copy of your request regarding demolition activities directly to Jack Ellvinger, LANS, at 505-667-0633 and Kate Lynnes, LANS, at 505-665-3019. These contacts may also be reached if you have any questions or require additional information after reviewing the information provided in the enclosures.

As always please feel free to contact either of us at 505-667-4218 or 505-667-5794, respectively, if you have any additional questions.

Sincerely,

Cindy Dutro for

J. Chris Cantwell, Associate Director
Environment, Safety, Health and Quality
Los Alamos National Security, LLC

Sincerely,

Gene Turner

Gene Turner
Environmental Permitting
Environmental Operations
Los Alamos Site Office

JCC:GT:GB/lm

Enclosures: a/s

Cy: Gene Turner, LASO-EO, w/enc., A316
Michael J. Graham, ADEP-EP, w/o enc., M991
Michael B. Mallory, PADOPS, w/o enc., A102
Allan B. Chaloupka, TA21-CP, w/o enc., C348
Duane A. Parsons, PROJMGMT, w/o enc., C349
Kathryn D. Lynnes, ENG-TECH, w/o enc., M991
Jack Ellvinger, ENV-RCRA, w/o enc., K490
Cathy Juarez, ENV-RCRA, w/enc., K490
Deborah K. Woitte, LC-LESH, w/o enc., A187
Ellen Louderbough, LC-LESH, w/o enc., A187
ENV-DO File, w/o enc., J978
ENV-RCRA File (09-204), w/enc., K490
IRM-RMMSO (U0902912), w/enc., A150

Enclosure 1

Information and Supporting Documentation of the Demolition of Building 21-167

Enclosure 1: Information and Supporting Documentation of the Demolition of Building 21-167

Building Number	1) Demolition Schedule	2) Historic Building Use(s)	3) Any Structural Parts of Building Used to Manage Wastes	4) Post-Demolition Building Material Characterization	5) Final Disposition of Demolition Debris
<p>Building 21-167 (Equipment Building)</p>	<p>a) Date building was placed on demolition schedule:</p> <p>The most recent schedule under the Settlement Agreement was 2nd Quarter FY 2010. The availability of ARRA funds resulted in a very fluid scheduling process as work execution strategies were evaluated to determine how to use the stimulus funding most efficiently. The schedule The Building 21-167 demolition date was moved up to October 09 in mid-to-late September.</p>	<p>a) Types of materials/equipment stored:</p> <p>The building housed a fan supplying fresh outside air to Building TA-21-152. This system was single-pass and the air was not re-circulated between buildings.</p> <p>b) Expected contaminants:</p> <p>Friable and non-friable asbestos containing material (ACM). No radiological or hazardous waste issues were expected.</p>	<p>a) Information on any structural parts of the building that may have been used in the generation or management of wastes:</p> <p>N/A as the building provided fresh-air intake only. No process activities occurred in the building.</p> <p>b) Description of any portions of the structures described in a) that remain in place after demolition:</p> <p>The building slab, pit and piping below grade remain in place and no underlying</p>	<p>a) Information on post-demolition characterization of debris:</p> <p>The Laboratory evaluates structures prior to demolition to determine if there are any building materials that require characterization for environmental or occupational health reasons.</p> <p>Based on historical process knowledge and past operations of the building, there was no reason to suspect hazardous or radiological materials from the demolition because</p>	<p>a) Information on final disposition of demolition debris:</p> <p>The structural steel material was sent for recycling, when possible, to ABQ, NM. The CMU/Industrial waste was sent to the Grassy Mountain Utah, Clean Harbors landfill.</p> <p>The Outer Shell had non-friable ACM and is packaged as ACM/non-radiological waste for shipment to Grassy Mountain/Clean Harbors, Utah landfill</p>

	<p>b) Date building was demolished:</p> <p>October 8, 2009.</p>	<p>c) Dates of operation:</p> <p>1945-1990</p> <p>d) Type of construction:</p> <p>Concrete slab on grade, 2-Story bldg w/ gyp-board siding and concrete masonry units (CMU)</p> <p>e) Any wastes generated or managed:</p> <p>No</p>	<p>soil was disturbed. The piping is empty and clean.</p> <p>c) Description of any connections to other buildings or structures:</p> <p>Prior to demolition a fresh air supply duct connected Building 21-167 to TA-21-152.</p>	<p>none were used or stored in the building.</p> <p>Radiological surveys of the building interior and exterior were performed prior to demolition to confirm that no radiological impact was present. ACM and suspect ACM were abated prior to demolition.</p>	
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Enclosure 2

Information and Supporting Documentation of the Demolition of Building 21-370

Enclosure 2: Information and Supporting Documentation of the Demolition of Building 21-370

Building Number	1) Demolition Schedule	2) Historic Building Use(s)	3) Any Structural Parts of Building Used to Manage Wastes	4) Post-Demolition Building Material Characterization	5) Final Disposition of Demolition Debris
<p>Building 21-370 (Mechanical Equipment Building)</p>	<p>a) Date building was placed on demolition schedule:</p> <p>The most recent schedule submitted to NMED under the Settlement Agreement was 2nd Quarter of FY 2010. The availability of ARRA funds created a fluid scheduling situation where work execution strategies were changing and accelerating. By the fourth week in September the Building 21-370 demolition date was moved up to 09/29/09.</p>	<p>a) Types of materials/equipment stored:</p> <p>The building housed a fan providing fresh air to Building TA-21-152. This Air was single-pass and not re-circulated between buildings.</p> <p>b) Expected contaminants:</p> <p>None</p> <p>c) Dates of operation:</p> <p>1985-2006</p> <p>d) Type of construction:</p> <p>Stuccoed concrete masonry units (CMU)</p>	<p>a) Information on any structural parts of the building that may have been used in the generation or management of wastes:</p> <p>N/A as the building provided fresh-air intake only. No process activities occurred in the building.</p> <p>b) Description of any portions of the structures described in a) that remain in place after demolition:</p> <p>The building slab and piping below grade remain in place.</p>	<p>a) Information on post-demolition characterization of debris:</p> <p>Post-characterization is not applicable as the building was characterized prior to demolition and showed no asbestos containing material (ACM), hazardous or radiological concerns.</p> <p>Based on historical process knowledge and past operations of the building, there was no reason to suspect hazardous materials from the demolition of the building. There is no history of hazardous material storage or use in the building.</p>	<p>a) Information on final disposition of demolition debris:</p> <p>The structural steel material was sent for metal recycling in ABQ NM. The CMU and other demolition debris material were sent to an industrial waste landfill in Colorado (Dear Trail Clean Harbors CO).</p>

	<p>b) Date building was demolished:</p> <p>09/29/09.</p>	<p>e) Any wastes generated or managed:</p> <p>No</p>	<p>Nothing below the slab was disturbed during demolition.</p> <p>c) Description of any connections to other buildings or structures:</p> <p>Prior to demolition there was an air-supply duct connecting 21-370 to 21-152.</p>	<p>Suspect ACMs were characterized and confirmed to not exist in or on the building.</p>	
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