

TA 73

Turner, Gene E.

From: Turner, Gene E.
Sent: Thursday, October 05, 2006 2:35 PM
To: 'kathryn.chamberlain@state.nm.us'; 'Bearzi, James, NMENV'
Subject: ASH PILE DOCUMENTATION

Importance: High



James/Kathryn-

I will be hand delivering a package to your office this afternoon that contains the following documentation:

- 1) The PR-ID (work authorization) for the project. The last section, Waste Management, clearly outlines the need to manage the ash as New Mexico Special Waste.
- 2) Daily log from 11/02/05 discusses re-establishing the ash zone perimeter.
- 3) Daily logs from 11/04/05, 11/07/05, 11/08/05, and 11/09/05 describe the material being recovered.
- 4) Field Activity Reports from 11/05/05, 11/07/05, 11/08/05, 11/13/05, and 11/14/05 indicate that can removal operations were clearly separate from ash removal.
- 5) A jump drive containing the following (please return the drive):
 - Photos from April 2005 sampling – additional pictures on location and conditions of cans during initial field work.
 - Photos from November 2005 can collection – pictures showing cans being collected below ash pile, bags being removed from below ash pile and materials being dumped without dust/ash.
 - Videos from November 2005 can collection – videos showing can collection below ash field and removal of bagged debris from below ash pile.

As you know, when we met on September 21, we reached an agreement re: the amount of penalty NMED would impose to settle the allegations contained in the NOV dated July 12, 2006, re: the disposal of debris from SWMU 73-002. NMED agreed that it would include a downward adjustment of 3% to recognize NNSA's good faith efforts in self-reporting the disposal of the debris at the Los Alamos landfill. NMED also agreed that it would impose an upward adjustment of 5% (rather than the proposed 15%) for history of noncompliance, and finally, that NMED would determine the economic benefit enjoyed by NNSA to be \$6220.40 (rather than the proposed \$40,180). Based on those factors, the penalty would be \$50,095, rather than the proposed \$88,930. NMED made its agreement to reduce the economic benefit contingent on NMED's verifying the accuracy of our economic benefit calculation, and our providing additional information.

Please call if there are additional questions.

Gene Turner
Environmental Permitting Manager
(505)667-5794



4976

ATTACHMENT 1

PR-1D

04P-0263, Ash Pile

Project Type: Large

Current Phase: PD

Project Start: Pre-Project/Pre-Conceptual Planning

PP-1	Permit:	Evaluate impact of project on adjacent facilities		
	Hold Point:	NNSA		
	Reason:	Project has been identified as new construction, modification to structures or land, or a change to programmatic work.		
	Guidance:	DOE-STD-3009 in the Work Smart Standards of Appendix G, Section 3.4.2 Design Basis Accidents, requires that impact on adjacent facilities be analyzed.		
	SME POC:	<u>ROBERT ENZ</u> , DOE-LA-AO (No Comments Received)		
	Reference:	DOE-STD-3009 in the Work Smart Standards of Appendix G, Section 3.4.2 Design Basis Accidents		
	SME POC Status:	Review Required <input type="button" value="v"/> 10	VIEW HISTORY/COMMENTS	UPDATE
	Customer Status:	Action Required <input type="button" value="v"/> 0	VIEW HISTORY/COMMENTS	UPDATE

PP-2	Permit:	National Historic Preservation Act Evaluation		
	Hold Point:	HOLD		
	Reason:	Activities involve new construction, D&D, modification to an existing facility, or work being performed outdoors.		
	Guidance:			

SME POC:	<u>KARI GARCIA</u> , ENV-ECO (No Comments Received) <u>LESLIE HANSEN</u> , ENV-ECO (Alternate) <u>CHARLES HATHCOCK</u> , ENV-ECO (Alternate) <u>DAVID KELLER</u> , ENV-ECO (Alternate) <u>WILLIAM MASSE</u> , ENV-ECO (Alternate) <u>DANIEL PAVA</u> , ENV-ECO (View Comments) <u>MARGARET POWERS</u> , ENV-ECO (Alternate) <u>SUSAN RADZINSKI</u> , ENV-ECO (Alternate) <u>LEONARD SANDOVAL</u> , ENV-ECO (Alternate) <u>MARJORIE WRIGHT</u> , ENV-ECO (Alternate)	
Reference:	<u>LIR 404-30-02</u> , NEPA, Cultural Resource, and Biological Resources (NCB) Process	
SME POC Status:	<input type="text" value="Review Complete"/> 12 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS UPDATE
Customer Status:	<input type="text" value="Action Complete"/> 2 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS UPDATE

PP-3	Permit:	NEPA, Cultural Resources, and Biological Resources (NCB) Review
	Hold Point:	LANL
	Reason:	Project involves new or modified programmatic or facility activities.
	Guidance:	Obtain an NEPA, Cultural and Biological Resources (NCB) review and prepare a preliminary NEPA Strategy based on that NCB Review.

SME POC:	<u>KARI GARCIA</u> , ENV-ECO (Alternate) <u>LESLIE HANSEN</u> , ENV-ECO (Alternate) <u>CHARLES HATHCOCK</u> , ENV-ECO (Alternate) <u>DAVID KELLER</u> , ENV-ECO (Alternate) <u>WILLIAM MASSE</u> , ENV-ECO (Alternate) <u>DANIEL PAVA</u> , ENV-ECO (View Comments) <u>MARGARET POWERS</u> , ENV-ECO (Alternate) <u>SUSAN RADZINSKI</u> , ENV-ECO (Alternate) <u>LEONARD SANDOVAL</u> , ENV-ECO (Alternate) <u>MARJORIE WRIGHT</u> , ENV-ECO (Alternate)		
Reference:	<u>LIR 404-30-02</u> , NEPA, Cultural Resource, and Biological Resources (NCB) Process		
SME POC Status:	<input type="text" value="Review Complete"/> 12 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS	UPDATE
Customer Status:	<input type="text" value="Action Required"/> 0 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS	UPDATE

PP-4

Permit:	Pollution Prevention		
Check Point:			
Reason:	Activity involves processes or materials where pollution prevention techniques could be applied.		
Guidance:			
SME POC:	<u>PATRICIA GALLAGHER</u> , ENV-SWRC (View Comments)		
Reference:	<u>LPR 404-00-00</u> , Environmental Protection		
SME POC Status:	<input type="text" value="Review Complete"/> 12 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS	UPDATE
Customer Status:	<input type="text" value="Action Complete"/> 2 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS	UPDATE

PP-5	Permit:	Potential Release Site (PRS)/Solid Waste Management Unit (SWMU) Review		
	Hold Point:	LANL		
	Reason:	All projects require review and approval from RRES-ECR.		
	Guidance:			
	SME POC:	<u>PAULA BERTINO</u> , ENV-ECR (Alternate) <u>ROY BOHN</u> , ENV-ECR (Alternate) <u>LYNDA HARTMAN</u> , ENV-ECR (View Comments) <u>MATTHEW SANCHEZ</u> , HSR-8 (Alternate)		
	Reference:	Hazardous Waste Facility Permit		
	SME POC Status:	<input type="text" value="Review Complete"/> 12 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS	UPDATE
Customer Status:	<input type="text" value="Action Required"/> 0 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS	UPDATE	

PP-6	Permit:	Pre-operational Survey Parameter Review		
	Hold Point:	HOLD		
	Reason:	Activities involve hazardous or radiological materials including wastes.		
	Guidance:	Activities involving hazardous and/or radioactive materials (including waste) must be screened through the pre-operational survey parameter review.		
	SME POC:	<u>GILBERT GONZALES</u> , ENV-ECO (View Comments)		
	Reference:	DOE Order 450.1 DOE Order 5400.5		
	SME POC Status:	<input type="text" value="Review In Process"/> 11 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS	UPDATE
Customer Status:	<input type="text" value="Action Required"/> 0 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS	UPDATE	

PP-7	Permit:	Radiological Engineering Review		
	Check Point:			
	Reason:	Activity involves environmental restoration work or outside work area maybe contaminated with radionuclides.		
	Guidance:	Radiological review should be performed on all possible radiological contaminated areas.		
	SME POC:	VIRGINIA REY, HSR-12 (View Comments)		
	Reference:	LM 107-01, LANL Radiological Control Manual		
	SME POC Status:	<input type="text" value="Review In Process"/> 11 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS	UPDATE
	Customer Status:	<input type="text" value="Action Required"/> 0 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS	UPDATE

PP-8	Permit:	Waste Management		
	Hold Point:	LANL		
	Reason:	The activity involves the generation of waste or transport/relocation of soil, asphalt, or concrete.		
	Guidance:			
	SME POC:	A DYE, ENV-SWRC (Alternate) HOLLY WHEELER-BENSON, ENV-SWRC (View Comments)		
	Reference:	LIR 404-00-02.3, General Waste Management Requirements		
	SME POC Status:	<input type="text" value="Review Complete"/> 12 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS	UPDATE
	Customer Status:	<input type="text" value="Action Required"/> 0 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS	UPDATE

Total Hold/Check Points for Pre-Project/Pre-Conceptual Planning: 8

Project Start: Conceptual Design

CD-1	Permit:	Mixed Low-Level Waste (MLLW) Review		
	Hold Point:	LANL		

Reason:	The activity involves Mixed Low Level Waste.		
Guidance:			
SME POC:	<u>AVRIL MILLENSTED</u> , NWIS-TP (No Comments Received)		
Reference:	<u>LIR 404-00-02.3</u> , General Waste Management Requirements <u>LIR 404-00-03</u> , Hazardous and Mixed Waste Requirements <u>LIR 404-00-05</u> , Managing Radioactive Waste		
SME POC Status:	<input type="button" value="Review Required"/> <input type="button" value="▼"/> 10 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS UPDATE	
Customer Status:	<input type="button" value="Action Required"/> <input type="button" value="▼"/> 0 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS UPDATE	

CD-2

Permit:	Permit for Installing Equipment		
Hold Point:	NMED		
Reason:	Activity involves installing equipment (asphalt production, rock crushing, carpenter shops, cooling towers, paint booths).		
Guidance:	Contact RRES-MAQ to determine if installation of new equipment (asphalt production, rock crushing, carpenter shops, cooling towers, paint booths) requires permitting or notification to New Mexico Environmental Department (NMED). Permitting must be initiated 6 months prior to installation. If new equipment is subject to permitting, installation and operation cannot commence until any required air permits have been issued.		
SME POC:	<u>STEPHEN COSSEY</u> , ENV-MAQ (Alternate) <u>JACKIE HURTLE</u> , ENV-MAQ (Alternate) <u>SUSAN TERP</u> , ENV-MAQ (View Comments) <u>WALTER WHETHAM</u> , ENV-MAQ (Alternate)		
Reference:	<u>20.2.72</u> , NMAC: Construction Permits <u>LIR 404-10-01</u> , Air Quality Reviews		
SME POC Status:	<input type="button" value="Review Complete"/> <input type="button" value="▼"/> 12 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS UPDATE	

Customer Status:	<input type="text" value="Action Required"/> 0 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS UPDATE
CD-3	Permit:	Waste Coordinator Review
	Hold Point:	LANL
	Reason:	All new construction and facility modification activities require a waste characterization and management plan for activities that will be addressed in their project plan.
	Guidance:	Contact your local area <u>Waste Management Coordinator</u> . Access to commonly used <u>waste management forms</u> . See LIG404-00-03, Waste Profile Form Guidance; LIG404-00-04, Chemical Waste Disposal Request; LIG404-00-02, Acceptable Knowledge Guidance.
	SME POC:	<u>GILBERT MONTOYA</u> , NWIS-SWO (No Comments Received)
	Reference:	<u>LIR 404-00-02.3</u> , General Waste Management Requirements <u>LIR 404-00-03</u> , Hazardous and Mixed Waste Requirements <u>LIR 404-00-04</u> , Managing Solid Waste <u>LIR 404-00-05</u> , Managing Radioactive Waste <u>LIR 404-00-06</u> , Managing Polychlorinated Biphenyls
	SME POC Status:	<input type="text" value="Review Required"/> 10 STATUS/ENTER COMMENTS
Customer Status:	<input type="text" value="Action Required"/> 0 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS UPDATE

Total Hold/Check Points for Conceptual Design: 3

Execution: Preliminary Design

PD-1	Permit:	Dredge and Fill Permit/Water Quality Certification
	Hold Point:	NNSA
	Reason:	The activity involves work conducted in or near an arroyo, drainage area, water course, wetlands area, or canyon.

Guidance:	Section 404 Dredge and Fill Permit from the Army Corps of Engineers and a New Mexico Section 401 Water Quality Certification are required for any project, regardless of size, that crosses or disturbs a watercourse. Permit and certification must be obtained prior to working in a watercourse.		
SME POC:	<u>JEFF SEAY, ENV-WQH</u> (View Comments)		
Reference:	<u>LIR 404-50-01</u> , Water Pollution Control		
SME POC Status:	<input type="text" value="Review In Process"/> 11 <small>STATUS/ENTER COMMENTS</small>	VIEW HISTORY/COMMENTS	UPDATE
Customer Status:	<input type="text" value="Action Required"/> 0 <small>STATUS/ENTER COMMENTS</small>	VIEW HISTORY/COMMENTS	UPDATE

PD-2

Permit:	Water Quality - Best Management Practices (BMPs)		
Check Point:			
Reason:	Activity involves soil disturbance.		
Guidance:	All soil-disturbing activities must have appropriate BMPs to control the migration of sediment and other contaminants into surface water either directly or indirectly. BMPs must be in place prior to the start of soil-disturbing activities.		
SME POC:	<u>JEFF SEAY, ENV-WQH</u> (View Comments)		
Reference:	<u>LIR 404-50-01</u> , Water Pollution Control		
SME POC Status:	<input type="text" value="Review Complete"/> 12 <small>STATUS/ENTER COMMENTS</small>	VIEW HISTORY/COMMENTS	UPDATE
Customer Status:	<input type="text" value="Action Required"/> 0 <small>STATUS/ENTER COMMENTS</small>	VIEW HISTORY/COMMENTS	UPDATE

Total Hold/Check Points for Preliminary Design: 2

Execution: Final Design

FD-1	Permit:	Notice to Proceed
	Hold Point:	LANL
	Reason:	An outside contractor, other than the Support Service Contractor, will be involved.

Guidance:	The contract administrator shall issue a written notice to proceed after the receipt of approved ES&H plans, drilling ES&H plan and/or IWD and any other applicable requirements or items.		
SME POC:	Contract Administrator (Alternate)		
Reference:	LIR 401-100-03		
SME POC Status:	<input type="button" value="Review Pending"/>	16	VIEW HISTORY/COMMENTS UPDATE
	STATUS/ENTER COMMENTS		
Customer Status:	<input type="button" value="Action Pending"/>	6	VIEW HISTORY/COMMENTS UPDATE
	STATUS/ENTER COMMENTS		

FD-2

Permit:	Temporary and Portable Sub-contractor Sources		
Check Point:			
Reason:	Activity involves temporary or portable sources being brought on-site by a sub-contractor.		
Guidance:	Temporary and portable sub-contractor sources are not considered part of the Laboratory for air permitting purposes. This type of source, if large enough to trigger construction permitting under 20.2.72 NMAC, should already have a construction permit issued by NMED. A relocation notice to NMED must be submitted by the owner for the permitted portable source to operate at a new location. Copies of permits and notices must be submitted to RRES-MAQ. The portable source is not considered part of LANL, and therefore is not considered a `modification` to LANL for air quality permitting purposes.		
SME POC:	<u>JACKIE HURTLE, ENV-MAQ (Alternate)</u> <u>SUSAN TERP, ENV-MAQ (View Comments)</u> <u>WALTER WHETHAM, ENV-MAQ (Alternate)</u>		
Reference:	<u>20.2.72, NMAC: Construction Permits</u> <u>LIR 404-10-01, Air Quality Reviews</u>		
SME POC Status:	<input type="button" value="Review Complete"/>	12	VIEW HISTORY/COMMENTS UPDATE
	STATUS/ENTER COMMENTS		
Customer Status:	<input type="button" value="Action Pending"/>	6	VIEW HISTORY/COMMENTS UPDATE
	STATUS/ENTER COMMENTS		

Total Hold/Check Points for Final Design: 2

Execution: Construction

CO-1	Permit:	Ambient Rad Air Monitoring	
	Hold Point:	DOE	
	Reason:	Activity involves disturbance of radioactive contaminated soil.	
	Guidance:	Diffuse sources of radioactive air emissions require ambient monitoring when the potential impact to the nearest off-site receptor is 0.1 mrem. Some projects may require an analysis to determine if the existing network of ambient monitoring stations is sufficient to capture potential emissions. Provide radionuclide characterization data to RRES-MAQ so a dose estimate can be made to determine if additional ambient rad air monitoring is required.	
	SME POC:	<u>STEPHEN COSSEY</u> , ENV-MAQ (Alternate) <u>CRAIG EBERHART</u> , ENV-MAQ (Alternate) <u>SUSAN TERP</u> , ENV-MAQ (View Comments) <u>WALTER WHETHAM</u> , ENV-MAQ (Alternate)	
	Reference:	<u>LIR 404-10-01</u> , Air Quality Reviews	
	SME POC Status:	<input type="text" value="Review Complete"/> 12 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS UPDATE
Customer Status:	<input type="text" value="Action Pending"/> 6 STATUS/ENTER COMMENTS	VIEW HISTORY/COMMENTS UPDATE	

CO-2	Permit:	Excavation Permit	
	Hold Point:	LANL	
	Reason:	Activity involves excavation.	
	Guidance:	An excavation review permit can be initiated at: http://esh-id.lanl.gov/excavation/reqmap.asp?Cmd=MAP . An excavation permit should be initiated two weeks prior to ground disturbance and is valid for six months from date of HSR review. Request for extension must be obtained prior to expiration date.	

SME POC:	<u>JULIE MARTINEZ</u> , HSR-8 (View Comments)	
Reference:	LIR 402-880-01.4, Excavation/Soil Disturbance Permit	
SME POC Status:	<input type="text" value="Review Complete"/> 12 <small>STATUS/ENTER COMMENTS</small>	VIEW HISTORY/COMMENTS UPDATE
Customer Status:	<input type="text" value="Action Complete"/> 2 <small>STATUS/ENTER COMMENTS</small>	VIEW HISTORY/COMMENTS UPDATE

CO-3	Permit:	Fire Danger Rating	
	Check Point:		
	Reason:	Activities will take place outside a facility. Before work begins, verify daily fire rating and follow appropriate controls.	
	Guidance:	Refer to http://int.lanl.gov/fire_matrix.html .	
	SME POC:	<u>ROBERT ENZ</u> , DOE-LA-AO (No Comments Received) <u>JANE LATAILLE</u> , FIRE (Alternate) <u>WALTER MARTINEZ</u> , FIRE (Alternate) <u>ALLEN TRUJILLO</u> , FIRE (Alternate) <u>JULIA WOOD</u> , FIRE (Alternate)	
	Reference:	No Reference	
	SME POC Status:	<input type="text" value="Review Pending"/> 16 <small>STATUS/ENTER COMMENTS</small>	VIEW HISTORY/COMMENTS UPDATE
	Customer Status:	<input type="text" value="Action Pending"/> 6 <small>STATUS/ENTER COMMENTS</small>	VIEW HISTORY/COMMENTS UPDATE

CO-4	Permit:	Lock-out/Tag-out: Mechanical Equipment
	Hold Point:	LANL
	Reason:	Activities involve mechanical equipment.
	Guidance:	
	SME POC:	FM Coordinator (No Comments Received)

Reference:	LIR 402-860-01 LIR 402-860-02, Lockout/Tagout For Personal Safety
SME POC Status:	<input type="text" value="Review Pending"/> 16 VIEW HISTORY/COMMENTS UPDATE <small>STATUS/ENTER COMMENTS</small>
Customer Status:	<input type="text" value="Action Pending"/> 6 VIEW HISTORY/COMMENTS UPDATE <small>STATUS/ENTER COMMENTS</small>

CO-5

Permit:	Rad Work Permit
Hold Point:	LANL
Reason:	Project involves radiological hazards or workers will be entering radiological areas.
Guidance:	See LIG402-700-01, Occupational Radiation Protection Guidance.
SME POC:	<u>VIRGINIA REY</u> , HSR-12 (View Comments)
Reference:	<u>LIR 402-700-01.2</u> , Occupational Radiation Protection Requirements
SME POC Status:	<input type="text" value="Review In Process"/> 11 VIEW HISTORY/COMMENTS UPDATE <small>STATUS/ENTER COMMENTS</small>
Customer Status:	<input type="text" value="Action Required"/> 0 VIEW HISTORY/COMMENTS UPDATE <small>STATUS/ENTER COMMENTS</small>

CO-6

Permit:	Site-Specific Health and Safety Plan (SSHASP) or Health and Safety Plan (HASP) Review
Hold Point:	LANL
Reason:	Activities involve environmental restoration/Decontamination & Decommissioning (ER/D&D) or related drilling operations performed by an outside contractor.
Guidance:	<u>Form 1692- ES&H Site Hazard and Control Form</u>
SME POC:	<u>BRAD GALLIMORE</u> , HSR-5 (No Comments Received)
Reference:	<u>LIR 402-10-01.8</u> , Hazard Analysis and Control for Facility Work <u>LIR 402-10-03.2</u> , ES&H Management of Contractor Performed Facility Construction/Maintenance, Environmental Restoration/D&D, and Related Drilling Operations

SME POC Status:	Review Pending	16	VIEW HISTORY/COMMENTS	UPDATE
STATUS/ENTER COMMENTS				

Customer Status:	Action Pending	6	VIEW HISTORY/COMMENTS	UPDATE
STATUS/ENTER COMMENTS				

CO-7

Permit:	Traffic Obstructions
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Hold Point:	LANL
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Reason:	Activities may obstruct or impede traffic.
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Guidance:	
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SME POC:	<u>DENNIS ARMSTRONG</u> , EMR (Alternate) <u>DAVID SEIDEL</u> , EMR (View Comments) <u>MELL SMITHOUR</u> , SSS-UD-K01 (No Comments Received) <u>CHARLES TRASK</u> , NWIS-UI (Alternate)
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Reference:	<u>LIR 403-00-01.3</u> , LANL Emergency Management
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SME POC Status:	Review Complete	12	VIEW HISTORY/COMMENTS	UPDATE
STATUS/ENTER COMMENTS				

Customer Status:	No Action Required	7	VIEW HISTORY/COMMENTS	UPDATE
STATUS/ENTER COMMENTS				

ROBERT ENZ

	Evaluate impact of project on adjacent facilities	PP	REVIEW REQUIRED
Guidance:	DOE-STD-3009 in the Work Smart Standards of Appendix G, Section 3.4.2 Design Basis Accidents, requires that impact on adjacent facilities be analyzed.		
Reference:	<i>DOE-STD-3009 in the Work Smart Standards of Appendix G, Section 3.4.2 Design Basis Accidents</i>		
SME POC Comments:			
	Fire Danger Rating	CO	REVIEW PENDING
Guidance:	Refer to http://int.lanl.gov/fire_matrix.html .		
Reference:	<i>No Reference</i>		
SME POC Comments:			

FM Coordinator

	Lock-out/Tag-out: Mechanical Equipment	CO	REVIEW PENDING
Guidance:			
Reference:	<u>LIR 402-860-02</u> , <i>Lockout/Tagout For Personal Safety</i> LIR 402-860-01 ,		
SME POC Comments:			

PATRICIA GALLAGHER

	Pollution Prevention	PP	REVIEW COMPLETE
Guidance:			

Reference:	LPR 404-00-00 , <i>Environmental Protection</i>
SME POC Comments:	3/21/2005 - SME POC Status: REVIEW COMPLETE No action required

BRAD GALLIMORE

	Site-Specific Health and Safety Plan (SSHASP) or Health and Safety Plan (HASP) Review	CO	REVIEW PENDING
Guidance:	Form 1692- ES&H Site Hazard and Control Form		
Reference:	LIR 402-10-03.2 , <i>ES&H Management of Contractor Performed Facility Construction/Maintenance, Environmental Restoration/D&D, and Related Drilling Operations</i> LIR 402-10-01.8 , <i>Hazard Analysis and Control for Facility Work</i>		
SME POC Comments:			

KARI GARCIA

	National Historic Preservation Act Evaluation	PP	REVIEW COMPLETE
Guidance:			
Reference:	LIR 404-30-02 , <i>NEPA, Cultural Resource, and Biological Resources (NCB) Process</i>		
SME POC Comments:			

GILBERT GONZALES

	Pre-operational Survey Parameter Review	PP	REVIEW IN PROGRESS
Guidance:	Activities involving hazardous and/or radioactive materials (including waste) must be screened through the pre-operational survey parameter		

	review.
Reference:	<i>DOE Order 5400.5</i> <i>DOE Order 450.1</i>
SME POC Comments:	<p>12/1/2004 - SME POC Status: REVIEW COMPLETE</p> <p>ISSUE: This review concerns the requirement to conduct preoperational surveys of contaminant levels in environmental media including biota, ecological risk screening/assessments, and/or environmental impact analyses of facilities, operations, or other activities that are planning or are likely to release radiological or hazardous materials that are considered Contaminants of Potential Ecological Concern (COPECs) into the environment. The requirements for this review are the Endangered Species Act, DOE Orders 450.1 and 5400.5, and NEPA.</p> <p>Review Comments - The long-term value of the clean-up to the environment is obvious. However, considering the steep incline of the slope where the work will be conducted, please identify the technical or administrative controls (Procedures, SSHASPs, Hazard Reviews, IWDs, etc.) that will prevent a release of contaminants from the sampling stations to the environment. Also please identify the constituents and maximum concentrations that are expected in the ash pile.</p> <p>RRES-ECO Action: Review completed. Evaluate controls and whether there is a need to consider a comparison of maximum contaminant concentrations to Ecological Screening Levels (ESLs).</p> <p>PROJECT ACTION: Please identify the technical or administrative controls (Procedures, SSHASPs, Hazard Reviews, IWDs, etc.) that will prevent a release of contaminants from the sampling stations to the environment. Please identify the contaminant constituents and maximum concentrations that are expected in the ash pile.</p>

LYNDA HARTMAN

	Potential Release Site (PRS)/Solid Waste Management Unit (SWMU) Review	PP	REVIEW COMPLETE
Guidance:			
Reference:	<i>Hazardous Waste Facility Permit</i>		
SME POC Comments:	<p>11/23/2004 - SME POC Status: REVIEW COMPLETE</p> <p>Because this work consists of cleanup of a SWMU site. RRES-RS general</p>		

requirements apply. The work may proceed as long as the following requirements are addressed:

General Requirements

Any work conducted within the bounds of a SWMU or AOC must be conducted in accordance with LIR 402-880-01.5, which states the following:

Projects to be conducted in SWMUs/AOCs shall be subject to one or more of the following requirements:

- ? site-specific safety plan
- ? Occupational Safety and Health Administration worker training
- ? soil disposal constraints
- ? limited site access to trained workers
- ? industrial hygiene monitoring
- ? personal protective equipment
- ? radiological surveillance
- ? enrollment in a medical surveillance program
- ? compliance with 29 CFR 1910.120 (HAZWOPER) and other applicable federal and state statutes and regulations, DOE Orders, and Laboratory policies
- ? detailed documentation of the excavation/soil disturbance activity indicating the exact location, length, width, depth, and amount of soil to be excavated/disturbed (provided in the excavation permit and PR-ID for the project).

LANL subcontractors should refer to Appendix A (A-1) of the RRES-RS Project Health and Safety Requirements Manual to determine applicable worker training requirements, equipment decontamination requirements etc. The manual can be found at the following URL:

<http://erproject.lanl.gov/documents/librarydocs/HSRM2003.pdf>

RRES-RS Requirements:

Any subcontractor conducting work within the boundary of a SWMU or AOC must be made aware of the potential contaminants present in soils and other materials at the site and the potential hazards associated with those contaminants.

All excavated soil, concrete, asphalt and other materials must be managed within the boundary of the SWMU or AOC and returned to the excavation upon completion of the project. Soil and other materials excavated within a PRS must be managed to ensure that it remains within the PRS boundary until it is returned to area from which it was excavated. This includes implementing measures to ensure the soil is not dispersed off the site by wind, storm water runoff, vehicle or pedestrian traffic, etc. Any soil or other material removed from a SWMU or AOC boundary and not returned to the

point of excavation must be managed, characterized, and disposed of by the subcontractor in accordance with all applicable LANL waste management LIRs and LIGs including approved waste profile forms, etc.

Storm water retention ponds cannot be located within the boundary of a SWMU or AOC nor can a retention pond be constructed of fill material from a SWMU or AOC, and storm water runoff must be diverted away from SWMUs and AOCs.

Best Management Practices (BMPs) for Storm Water Pollution Prevention (SWPP) and/or soil erosion control must be in place for all projects prior to the start of any soil disturbing activities within a PRS to minimize potential contaminant migration. Please refer to the HSR-18 documentation for erosion control requirements, Storm/Surface Water Pollution Prevention Best Management Practices Guidance Document, and the LANL Civil Engineering Standards Manual, Section 218. Questions may be directed to Robin Reynolds at 667-4689.

RRES-RS Project Facility Integration staff shall be consulted throughout the execution of this project and be kept apprised of activities to ensure appropriate documentation of the cleanup.

JULIE MARTINEZ

	Excavation Permit	CO	REVIEW COMPLETE
Guidance:	An excavation review permit can be initiated at: http://esh-id.lanl.gov/excavation/reqmap.asp?Cmd=MAP . An excavation permit should be initiated two weeks prior to ground disturbance and is valid for six months from date of HSR review. Request for extension must be obtained prior to expiration date.		
Reference:	<u>LIR 402-880-01.4</u> , <i>Excavation/Soil Disturbance Permit</i>		
SME POC Comments:	12/8/2004 - SME POC Status: REVIEW COMPLETE Excavation permit review 04X-0765 was completed on 12/08/04 and forwarded to KSL UMAP for the issuance of the excavation permit. For more information on the permit issuance please contact UMAP at 5-1051.		

AVRIL MILLENSTED

	Mixed Low-Level Waste (MLLW) Review	CD	REVIEW REQUIRED
Guidance:			
Reference:	<u>LIR 404-00-02.3</u> , <i>General Waste Management Requirements</i> <u>LIR 404-00-03</u> , <i>Hazardous and Mixed Waste Requirements</i> <u>LIR 404-00-05</u> , <i>Managing Radioactive Waste</i>		
SME POC Comments:			

GILBERT MONTOYA

	Waste Coordinator Review	CD	REVIEW REQUIRED
Guidance:	Contact your local area <u>Waste Management Coordinator</u> . Access to commonly used <u>waste management forms</u> . See LIG404-00-03, Waste Profile Form Guidance; LIG404-00-04, Chemical Waste Disposal Request; LIG404-00-02, Acceptable Knowledge Guidance.		
Reference:	<u>LIR 404-00-02.3</u> , <i>General Waste Management Requirements</i> <u>LIR 404-00-04</u> , <i>Managing Solid Waste</i> <u>LIR 404-00-06</u> , <i>Managing Polychlorinated Biphenyls</i> <u>LIR 404-00-03</u> , <i>Hazardous and Mixed Waste Requirements</i> <u>LIR 404-00-05</u> , <i>Managing Radioactive Waste</i>		
SME POC Comments:			

DANIEL PAVA

	NEPA, Cultural Resources, and Biological Resources (NCB) Review	PP	REVIEW COMPLETE
Guidance:	Obtain an NEPA, Cultural and Biological Resources (NCB) review and prepare a preliminary NEPA Strategy based on that NCB Review.		

Reference:	LIR 404-30-02 , <i>NEPA, Cultural Resource, and Biological Resources (NCB) Process</i>
SME POC Comments:	<p>12/2/2004 by <u>MARJORIE WRIGHT</u>, ENV-ECO - SME POC Status: REVIEW COMPLETE</p> <p>CULTURAL RESOURCES: ISSUES: None ECOLOGY GROUP CULTURAL RESOURCE ACTIONS: None YOUR ACTIONS: None</p> <p>BIOLOGICAL RESOURCES: ISSUES: Sensitive Habitat and Potential for Erosion ECOLOGY GROUP BIOLOGICAL RESOURCES ACTIONS: None. YOUR ACTIONS (REQUIRED): Noise restrictions are not applicable on this action due to coverage under the Airport Landfill USFWS consultation. This site occurs in sensitive habitat and is covered under the Airport Landfill Biological Assessment and is required to follow all requirements of that document. In addition there is a restriction on tree removal. Trees greater than 8 inches in diameter at (measured at 1.5 m) are not to be removed.</p> <p>We must receive confirmation that activity on your project will follow the Biological Assessment Restrictions, and that trees greater than 8 inches diameter will not be removed, before we can determine that biological compliance requirements have been met.</p> <p>If these requirements cannot be met, a Biological Assessment may need to be completed. ENV-ECO can help with the planning of the action to determine if small changes to timing or scope can be accomplished to allow this action to be completed without delay. If a Biological Assessment is required, ENV-ECO can help you through the process to complete the work with limited delays to the timing and scope of the action.</p> <p>Sites will require best management practices for storm water protection, site restoration, and re-vegetation with native plants following the action.</p> <p>Feel free to contact me (7-7037, dckeller@lanl.gov) regarding biological issues or to request a site visit.</p> <p>NATIONAL ENVIRONMENTAL POLICY ACT (NEPA): Issues: None. Provided that the biological resources restrictions can be accommodated, the proposed work is within the scope of a DOE-approved NEPA categorical exclusion for Remediation of Ash Debris at Potential Release Site 73-002 (LASO-05-001). For questions contact Marjorie Wright (665-6091, wright@lanl.gov).</p>

VIRGINIA REY

	Rad Work Permit	CO
Guidance:	See LIG402-700-01, Occupational Radiation Protection Guidance.	
Reference:	<u>LIR 402-700-01.2</u> , <i>Occupational Radiation Protection Requirements</i>	
SME POC Comments:	12/1/2004 - SME POC Status: Per section 7.0 of request, `Surface and/or sub-surface sampling and characterization of contaminants will be required.`... `The area is potentially contaminated with radionuclides or chemicals.` Therefore, obtain a Radiation Work Permit (RWP) through HSR-1 supervisor Larry Pacheco. Larry may be reached at ph 7-5185 or pg 996-0504.	
	Radiological Engineering Review	PP
Guidance:	Radiological review should be performed on all possible radiological contaminated areas.	
Reference:	LM 107-01 , <i>LANL Radiological Control Manual</i>	
SME POC Comments:	12/1/2004 - SME POC Status: <i>REVIEW IN PROGRESS</i> Coordinate environmental restoration activities for the TA-73 Ash Pile Project through ER, HSR-1 supervisor Larry Pacheco. Larry may be reached at ph 7-5185 or pg 996-0504. As noted in section 1.8.2 of request, `Rad constituents, U-234 and U-238, were detected above background values in the ash debris.` HSR-1 can provide operational health physics support and radiological assessments. HSR-1 must review the Health & Safety Plan/Site Specific Health & Safety Plan. Copy of PR-ID request sent to Larry Pacheco.	

JEFF SEAY

	Dredge and Fill Permit/Water Quality Certification	PD
Guidance:	Section 404 Dredge and Fill Permit from the Army Corps of Engineers and a New Mexico Section 401 Water Quality Certification are required for any project, regardless of size, that crosses or disturbs a watercourse. Permit and certification must be obtained prior to working in a watercourse.	
Reference:	<u>LIR 404-50-01</u> , <i>Water Pollution Control</i>	

SME POC Comments:	<p>12/20/2004 - SME POC Status:</p> <p>Although it is my understanding that proposed activities will not require a New Mexico Section 401 Water Quality Certification or an Army Corps of Engineers 404 Dredge and Fill Permit, please contact Bob Beers (Office: 667-7969, Cell: 699-2342, Email: bbeers@lanl.gov) at ENV-WQH so that he can make final determination regarding 404/401 needs for this project.</p>		
	Water Quality - Best Management Practices (BMPs)	PD	REVIEW COMPLETE
Guidance:	<p>All soil-disturbing activities must have appropriate BMPs to control the migration of sediment and other contaminants into surface water either directly or indirectly. BMPs must be in place prior to the start of soil-disturbing activities.</p>		
Reference:	<p><u>LIR 404-50-01</u>, <i>Water Pollution Control</i></p>		
SME POC Comments:	<p>12/20/2004 - SME POC Status: REVIEW COMPLETE</p> <p>As always, please utilize and maintain Best Management Practices (BMPs) to prevent excavated materials and other pollutants, such as oil from vehicles/equipment from washing off site with storm water flow or non-storm water discharges. Keep excavated materials away from drainage areas (i.e., storm gutters, runoff channels). Maintain good housekeeping practices. Stabilize all disturbed areas (re-vegetate, concrete, asphalt, etc) as appropriate at end of project. Take measures as necessary to prevent relocation of contaminated soils from the site. Properly dispose of all wastes generated by this project. Feel free to contact Robin Reynolds (Office: 667-4689, Cell: 699-1945, Email: robinp@lanl.gov) or me (Office: 662-0606, ext. 3185, Cell 699-3674, Email: jeff.seay@merrick.com) with questions regarding BMP applications, installation, and maintenance.</p>		
Overall or additional comments, findings, or requirements.	<p>12/20/2004 COMMENTS PER ENV-WQH STORM WATER/NPDES REQUIREMENTS</p> <p>REQUIRED ACTION - SWPPP: Before commencing with soil disturbing activities, IT IS REQUIRED that you contact Jennifer Foote (Office: 662-0606, ext. 3191, Cell: 699-0744, email: jennifer.foote@merrick.com) to set up a site visit to determine Storm Water Pollution Prevention requirements (i.e., this work may need to be covered under the ER SWPPP).</p> <p>REVIEWER CONTACT INFO: Feel free to contact me (Office: 662-0606, ext. 3185, Cell 699-3674.</p>		

Email: jeff.seay@merrick.com) regarding water quality and hydrology issues or to request a site visit.

DAVID SEIDEL

	Traffic Obstructions	CO	REVIEW COMPLETE
Guidance:			
Reference:	<u>LIR 403-00-01.3</u>, LANL Emergency Management		
SME POC Comments:	2/7/2005 - SME POC Status: REVIEW COMPLETE Traffic obstruction is unlikely to occur.		

MELL SMITHOUR

	Traffic Obstructions	CO	REVIEW COMPLETE
Guidance:			
Reference:	<u>LIR 403-00-01.3</u>, LANL Emergency Management		
SME POC Comments:			

SUSAN TERP

	Ambient Rad Air Monitoring	CO	REVIEW COMPLETE
Guidance:	Diffuse sources of radioactive air emissions require ambient monitoring when the potential impact to the nearest off-site receptor is 0.1 mrem. Some projects may require an analysis to determine if the existing network of ambient monitoring stations is sufficient to capture potential emissions. Provide radionuclide characterization data to RRES-MAQ so a dose estimate can be made to determine if additional ambient rad air monitoring is required.		
Reference:	<u>LIR 404-10-01</u>, Air Quality Reviews		
SME POC Comments:	12/9/2004 by <u>STEPHEN COSSEY</u>, ENV-MAQ - SME POC Status: REVIEW COMPLETE		

	<p>It is policy of the Laboratory that characterization and sampling activities that are conducted in order to determine the extent of contamination do not require pre-construction approval or ambient monitoring due to small sampling size, low levels of contamination and minimal emissions.</p> <p>When the characterization data for the ash pile is collected, that information will be required so a determination of the applicability of this checkpoint can be made with regards to the clean up phase of this project. The information required is the type and concentrations of the radionuclides as well as the ash quantities being disturbed. Upon receipt of this information it will take approximately two weeks to perform the calculations and determine the adequacy of the existing monitoring in the area. Please provide this information to Steve Cossey at 5-8893 or Susan Terp at 5-8889.</p>		
	Permit for Installing Equipment	CD	REVIEW COMPLETE
Guidance:	<p>Contact RRES-MAQ to determine if installation of new equipment (asphalt production, rock crushing, carpenter shops, cooling towers, paint booths) requires permitting or notification to New Mexico Environmental Department (NMED). Permitting must be initiated 6 months prior to installation. If new equipment is subject to permitting, installation and operation cannot commence until any required air permits have been issued.</p>		
Reference:	<p><u>LIR 404-10-01</u>, <i>Air Quality Reviews</i></p> <p><u>20.2.72</u>, <i>NMAC: Construction Permits</i></p>		
SME POC Comments:	<p>12/9/2004 by <u>STEPHEN COSSEY</u>, ENV-MAQ - SME POC Status: REVIEW COMPLETE</p> <p>Information on the proposed processes and equipment to be used is required to determine the applicability of this checkpoint. Specifically, ENV MAQ needs to estimate quantities of suspended particulates potentially generated during the project.</p>		
	Temporary and Portable Sub-contractor Sources	FD	REVIEW COMPLETE
Guidance:	<p>Temporary and portable sub-contractor sources are not considered part of the Laboratory for air permitting purposes. This type of source, if large enough to trigger construction permitting under 20.2.72 NMAC, should already have a construction permit issued by NMED. A relocation notice to NMED must be submitted by the owner for the permitted portable source to operate at a new location. Copies of permits and notices must be submitted to RRES-MAQ. The portable source is not considered part of</p>		

	LANL, and therefore is not considered a `modification` to LANL for air quality permitting purposes.
Reference:	<u>LIR 404-10-01</u> , <i>Air Quality Reviews</i> <u>20.2.72</u> , <i>NMAC: Construction Permits</i>
SME POC Comments:	12/9/2004 by <u>STEPHEN COSSEY</u>, ENV-MAQ - SME POC Status: REVIEW COMPLETE It is the responsibility of the contractor bringing equipment on site to meet all applicable regulatory requirements.
Overall or additional comments, findings, or requirements.	12/9/2004 by <u>STEPHEN COSSEY</u>, ENV-MAQ Disposal of dioxin containing materials needs to be considered by ENV-MAQ for reporting under Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA). Ensure that adequate records on dioxin and dioxin contaminated materials are maintained for compliance reporting purposes. The information needed on dioxin waste will be accessed through TA-54's records if the waste is disposed of through TA-54. However, if the waste is not tracked through TA-54, please provide Margie Stockton of ENV-MAQ with information on the amount of material disposed and dioxin concentration data. Characterization data for the non-radiological constituents is also required in order to determine the applicability with regards to HAPS, VOC, and EPCRA regulatory requirements.

HOLLY WHEELER-BENSON

	Waste Management	PP	REVIEW COMPLETE
Guidance:			
Reference:	<u>LIR 404-00-02.3</u> , <i>General Waste Management Requirements</i>		
SME POC Comments:	12/17/2004 - SME POC Status: Ensure that a sampling plan is written in accordance with Chapter 9 of SW-846 to ensure that samples are representative of the waste stream(s) to be generated and ensure data quality objectives are rigorous enough to support a future `no further action` determination by the New Mexico Environment Department, Hazardous Waste Bureau relative to the solid waste management unit (73-002) identified in Module VIII of Los Alamos		

National Laboratory's Hazardous Waste Facility Permit.

In accordance with LANL LIR 404-00-02.3, the generator shall provide accurate and complete waste characterization information as required by the receiving facility's (on- or off-site storage and/or disposal facility) acceptance criteria, ensuring that regulated constituents in waste streams are identified. Also, in accordance with the same LIR, individual waste generators shall complete Waste Profile Forms to document the characterization of each waste stream or shall otherwise comply with the receiving facilities' required documentation. A determination shall be made and expectations clearly defined as to whether the subcontractor (ITSI) or DOE is the generator and thereby responsible for complying with all applicable regulatory requirements.

Organic chemicals including pesticides, dioxins, furans, and solvents may be hazardous or mixed waste if they meet the listing description for non-specific sources (i.e., F-listed hazardous or mixed waste identified in 40 CFR Part 261.31). Inorganics including arsenic, barium, cadmium, chromium, mercury, selenium and silver (all of which were identified as being present in the ash) at certain concentrations are considered to be regulated hazardous or mixed waste. Hazardous or mixed waste generated shall follow the requirements specified in LANL LIR 404-00-03.

Dioxin waste may be considered ?no path forward? waste which requires approval by DOE prior to generation. See LANL LIG 404-00-05 for information on how to prepare an approval request package.

Ash that is not radioactively contaminated is considered New Mexico Special Waste and has specific waste management requirements under the New Mexico Solid Waste Management Regulations. Guidance regarding waste management requirements for New Mexico Special Waste can be obtained at <http://swrc.lanl.gov/pdf/files/iwmWasteControls.pdf> under 'general New Mexico Special Waste Requirements' and 'Ash.'

Petroleum contaminated soil and asbestos are also considered New Mexico Special Waste. The web page listed above also has information relative to these types of waste.

Solid waste and New Mexico special waste (that are not radioactively-contaminated) are subject to the requirements specified in LANL LIR 404-00-04.

Soil moved from the location of excavation to another technical area within LANL requires written approval from the RDL or designee for the receiving location. Prior to release of fill material or soil for use outside of the LANL facility boundary, the RDL, Project Coordinator, Person-in-Charge, Facility

Manager or designee shall submit documentation establishing that the material or soil is not contaminated to ENV-SWRC (667-0666) and obtain approval prior to off-site disposition of this material. (See section 6.2 of Excavation/Soil Disturbance Permit Process LIR 402-880-01).

12/3/2004 by A DYE, ENV-SWRC - SME POC Status: REVIEW COMPLETE

Low level waste does is excluded from the NM Solid Waste Management Regulations definition of a solid waste. If any of the ash is not low level, then the ash may be regulated as a New Mexico Special waste and would have to be managed in accordance with those regulations. If any of the ash is found to have 50 ppm PCBs or more, then it is subject to the TSCA regulations.

General Comments

(12/22/2004) by ALLEN TRUJILLO, FIRE
EEO-Fire shall evaluate the process prior to work commencing, purpose is to determine any potential fire harards due to the process and or the equipment during the operation.

ATTACHMENT 2

Innovative Technical Solutions, Inc. (ITSI) DAILY ACTIVITY LOG	DATE	02-Nov-05
	SHEET 1 OF	

Project Name: Consolidated Unit 73-002-99	Project No 04-400.12
Activity Subject: Haul Road Construction	

Personnel on Site			Equipment on Site		
Name	Title	Hours	Type of Equipment	Mobilized	De-Mobilize
Dwight Houser	Project Manager	10	64' - Trailer	10/21/2005	
Kevin Konzen	Rad	10	StorageConnex	7/4/2005	
Jim Cox	Oversight	10	Front Loader/DTT	10/27/2005	
Chuck Clyde	Site Supervisor	10	Hoe/DTT	10/27/2005	
DTT-Dave, Ray,Terry	Operators	32	Flatbed trailer	10/27/2005	
Elmer		8	Roller/DTT	10/31/2005	11/2/2005
Keers			1/2 Ton Ford	10/31/2005	
Akil, Daniel, Raymond		24	3/4 Ton Dodge	10/31/2005	
			Motor Grader	11/1/2001	

Materials Received

DTT imported cubic yards 140of base rock material.

Today's Activities:

DTT crews completed construction of the access road to the site. 140 cubic yards of import base was hauled in to complete the project. DDT staged all there equipment in the lay-down area to be rad checked. The sheep's foot roller was swiped at approximately 4:00pm and Dave Bullock (RCT) called at around 5:00 to inform us it was clear to go.

Total import base 640 cubic yards for access road.

Kers crews continued to clear and grub the areas outside the ash zone in preparation for the Sky Line and the supper sucker.

Crews hauled the vegetation to the local landfill and put it through a chipper.

Kevin Konzen and Chuck Clyde re established the west perimeter of the ash zone and found favorable locations for BMP placements.

Visitors on Site	CHANGES FROM PLANS AND SPECIFICATIONS, AND OTHER SPECIAL ORDERS AND IMPORTANT DECISIONS:
Terry Rust LANL	
Tom Newton- KEERS	
Chris Lara - KEERS	

WEATHER CONDITIONS: clear 32 to 70 degrees

SIGNATURE: *Chuck Clyde* DATE: 11/1/2005

ATTACHMENT 3

Innovative Technical Solutions, Inc. (ITSI)			DATE	07-Nov-05	
DAILY ACTIVITY LOG			SHEET 1 OF		
Project Name: Consolidated Unit 73-002-99			Project No	04-400.12	
Activity Subject: Debris Clean-up					
Personnel on Site			Equipment on Site		
Name	Title	Hours	Type of Equipment	Mobilized	De-Mobilize
Dwight Houser	Project Manager	9	64' - Trailer	10/21/2005	
Dennis Rich	H&S	9	StorageConnex	7/4/2005	
Chuck Clyde	Site Supervisor	9	Super Sucker	11/4/2005	
Keven Konzen	Rad Tech	9	1/2 Ton Ford	10/31/2005	
			3/4 ton Dodge	10/31/2005	
Keers					
Akil, Daniel, Raymond	Tech's	24			
Diego, Larry, Albert	Tech's	24			
Swagart					
Ted, Joe, Bill, Dave,	Techs	12			
Chuck, Ryan		6			
Materials Received					
Yarder (Swagart)					
50 IP-2 Bags (ITSI)					
2 Bag Lifts (ITSI)					
Today's Activities:					
Keers crews continued <u>bagging debris</u> in a pocket of <u>cans</u> just below the first ledge of rock working from the east to west.					
Crews placed the debris mainly in nylon woven bags that hold approximately 2 cubic feet.					
Crews loaded and staged ~550 bags today.					
Dave Bullock (RCT) collected background samples on the Guzzler and the Yarder.					
Swagart's Yarder arrived today. It will have to be placed on the lower level not on the upper level as we had anticipated.					
They will anchor their Yarder with excavators which should arrive tomorrow.					
Swagart's crew will be in GET training tomorrow. ITSI is also arranging for blood lead test for them.					
Dennis Rich gave Swagart's crew Site Specific Training.					
Keers on site from 0700 to 1530					
Swagart on Site from 1200 to 1630.					
Visitors on Site		CHANGES FROM PLANS AND SPECIFICATIONS, AND OTHER SPECIAL ORDERS AND IMPORTANT DECISIONS:			
Vince Rodriguez- Dura Tech		The placement of equipment may be changed from the plan to meet equipment requirements.			
WEATHER CONDITIONS: clear 32 to 70 degrees, breezy					
SIGNATURE:		DATE:			
		11/7/2005			

ATTACHMENT 4

Project: LANL, Ash Removal	Date: 11-5-05	Page 1 of 1
Client: USACE/DOE/LANL	Contract No.: DACA05-99-D-0014	Project No.: 04-400.12
Work Description: Removal of debris (outside of ash pile)		
Subcontractors/Visitors: Keers		
Weather: Clear and Cool With gust of wind		

DESCRIPTION OF FIELD ACTIVITIES AND EVENTS

0645 – On Site, prepared daily tailgate and prep evolution for today.

0700 – Keers on site, Chuck held daily evolution meeting with them, and I went over tailgate for today's activities of placement debris removal. Discussed proper PPE, and informed them to only pick debris in the debris field only, reviewed figure 4 of the work plan to show areas of debris field. Went over slope safety measures and three point contact while descending and ascending the hill side. Reminded them to check ropes prior to using them for any damage that might cause failure.

0720 – Went over initial SHSP with Diego Gonzales with Keers, and had him sign acknowledgement sheet. Reviewed his certs and placed in file.

0745 – Updated H&S certs record matrix with received medical clearance for Keers employees, and Chuck Clyde's medical as well.

0845 – Keers and Chuck are at the bottom of the debris field, and are setting up to bag debris for later removal with the skyline. (will be in place later this week)

0900 – Placed rope/caution tape around remainder of open access of parking lot, along with appropriate signs.

1000 – Keers continues to clear debris from debris field, and bag, currently have approx. 200 bags (55gal drum liners) filled and continuing to add more.

1015 – Dwight on site to check on production, Chuck informed him of debris field clean up on-going by Keers, and the need to have more bins for disposal of bags, due to the large amount already completed this morning.

1100 – Keers continues to bag debris, wind is gusting at the top of the hill, but Raymond with Keers informed me that there is little to no wind down off the hill where there bagging debris.

1200 – Worked on project photo log.

1300 – Spoke with Raymond w/ Keers to check on there status. Raymond informed me that all is going well; approx 400 bags have been filled.

1400 – Keers is at approx 500 bags of debris, will be coming up at 1450.

1500 – Keers is off the hill side, secured area, and equipment yard.

1530 – Site secured, and off site

Prepared by:	Dennis D. Rich IV	Signature: 	Date: 11-5-05
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FIELD ACTIVITY REPORT

Project: LANL, Ash Removal	Date: 11-8-05	Page 1 of 1
Client: USACE/DOE/LANL	Contract No.: DACA05-99-D-0014	Project No.: 04-400.12
Work Description: Removal of debris (outside of ash pile), set up of Vac System.		
Subcontractors/Visitors: Keers		
Weather: Clear and Cool		

DESCRIPTION OF FIELD ACTIVITIES AND EVENTS

- 0645 – On Site, prepared daily tailgate and prep evolution for today.
- 0700 – Keers on site, Held morning evolution/tailgate meeting, went over today's activities of removal of debris out side of ash pile. Spoke to them about medical emergencies procedures (broken bone will call fire department, sprang will immobilize and assets proper removal needed), reminded them to watch for falling debris from above them , and to not work above/below others to avoid falling debris.
- 0730 – Keers personnel making there way down hill side via rope assist lines.
- 0705 – Terry Rust with LANL on site, I escorted him to overlook Keers activities from the pier. Terry left site at 0800.
- 0715 – Keers personnel making there way down hill side via rope assist lines.
- 0730 – Terry Rust off site.
- 0800 – Downloaded from OSHA web site regulations for yarder under CFR29 1910, 1928.
- 0900 – Spoke with Raymond (Keers) all is OK on hill side. Completed roping area around parking lot to secure from work zone.
- 0915 – Bob Enz with DoE on site, escorted him to oversee Keers activities from landing pier.
- 1000 – Waste Management on site to delivery 20yd bin. Chuck escorted them to area for placement of bin.
- 1030 – Loader for Swaggart being delivered. Called airport manager to gain access onto tarmac for delivery truck to turn around due to its large size.
- 1200 – Loader for Keers on-site, pulled operator manual to check weight of unit (39,000)
- 1300 – Collected information on Thunderbird Yarder unit (Sirel # R4044, Model TMY40). Noted no operator mannul with unit.
- 1340 – Bill Bartles with New Mexico Environment Dept (LANL oversight) on site. Bill is monitoring air station already installed around the airport. Will be setting a new station to monitor or activities on the hill side.
- 1430 – Keers setting up vac unit along side pier railings. Not setting up vac lines that go from unit down hill side at this time. Spoke with Dave about required PPE for working in ash pile area (tyveks, half face resp., and ankle supported boots, with latex gloves.
- 1600 – Keers personnel of hill side, and securing equipment, and off site at 1630.
- 1700 – Completed daily FADL, and off site.

Prepared by:	Dennis D. Rich IV	Signature: 	Date:	11-8-05
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FIELD ACTIVITY REPORT

Project: LANL, Ash Removal	Date: 11-13-05	Page 1 of 1
Client: USACE/DOE/LANL	Contract No.: DACA05-99-D-0014	Project No.: 04-400.12
Work Description: Removal of debris (outside of ash pile), and bagging of debris.		
Subcontractors/Visitors: Keers, and Swaggert		
Weather: Cool with no rain.		

DESCRIPTION OF FIELD ACTIVITIES AND EVENTS

0740 – On-site, prepared daily tailgate.

0800 – Tailgate meeting with Keers crew, will be continuing removal of ash material within the exclusion zone. Reminded all personnel of exclusion zone entry requirements, and pre-cautions. The need to check rope prior to hooking on. Remainder of crew not working on ask removal will continue to bag debris well below ash area.

0820 – Observed Keers personnel dawning there PPE, and prepared air sampling log for today activities.

0846 – 0856 – Placed personnel air sampling pumps on two personnel entering onto the exclusion zone, and one on the Guzzler operator.

1000 – Keers is having trouble removing the ash material. There vac unit is clogging up, and they are spending time to clear.

1200 – Keers has stopped vac operations, and I pulled personnel air samples pumps, and logged.

1230 – Keers crew at lunch

1400 – Keers personnel are all bagging debris material for the remainder of the day.

1530 – Keers personnel are off the hillside and securing site for the day. Off site at 1600.

1615 – Completed daily log and off site.

Prepared by:	Dennis D. Rich IV	Signature: 	Date:	11-13-05
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FIELD ACTIVITY REPORT

Project: LANL, Ash Removal	Date: 11-14-05	Page 1 of 1
Client: USACE/DOE/LANL	Contract No.: DACA05-99-D-0014	Project No.: 04-400.12
Work Description: Removal of debris (outside of ash pile), set up of Vac System.		
Subcontractors/Visitors: Keers, and Swaggart		
Weather: Clear and Cool		

DESCRIPTION OF FIELD ACTIVITIES AND EVENTS

- 0645 – On Site, prepared daily tailgate and prep evolution for today.
- 0700 – Held tailgate meeting with both Keers, and Swaggart crews. Spoke about working safety rules of yarder operations, and falling debris. Checking equipment prior to operating. Keers will be bagging debris from debris field below ash area. Swaggart will be operating Yader and flying bagged debris for placement into roll off bins for disposal. Terry with DOE on-site.
- 0720 – Received equipment inspection from Keers for loaders, and Swaggart for Yarder, and loader.
- 0800 – Keers personnel are bagging debris, while the riggers with Keers prepare for Skyline Yarder, no operations of Guzzler is being done today. Radioed Ryan Fox with Swaggart
- 0900 – Meet with Mark Fisk and Rex Calderwood with MPE to look at alternative method to remove ash.
- 1000 – Observed Swaggart operating Yarder skyline. No issues at this time. Keers continues to bag can debris for removal off hill by Skyline.
- 1100 – Updated equipment inspection log, and H&S binder.
- 1200 – Crews are off hill side for lunch
- 1400 – Prepared air samples from 11-12-05, and 11-13-05 for shipment to Forincis in Hayward CA.
- 1500 – Shipped via Fed-ex personnel air samples noted above.
- 1650 – Yarder operation shut down for the day, all personnel on hill side on there way up.
- 1700 – All crews off hill side and off site.
- 1800 – Completed daily log, and off site.

Prepared by:	Dennis D. Rich IV	Signature: 	Date:	11-14-05
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