



ESHID-603820

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February 7, 2024

Robert A. Gallegos, Manager
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National Nuclear Security Administration
DOE Los Alamos Field Office
3747 West Jemez Rd, MS A316
Los Alamos, NM 87544

Brian Harcek, Acting Co-Director
Office of Quality and Regulatory Compliance
Environmental Management
DOE Los Alamos Field Office
1200 Trinity Drive, Suite 400P
Los Alamos, NM 87544

**RE: DEMOLITION NOTIFICATION FOR FISCAL YEAR 2024 AND QUARTER ENDING
DECEMBER 31, 2023, LIST OF BUILDINGS AND ATTACHMENT OF HAZARDOUS
MATERIALS DESCRIPTIONS, REVISION 1, HAZARDOUS WASTE FACILITY PERMIT
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-MISC**

Dear Robert A. Gallegos and Brian Harcek:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE), the National Nuclear Security Administration Los Alamos Field Office (NA-LA) and the DOE - Environmental Management Los Alamos Field Office (EM-LA), along with Triad National Security, LLC (Triad), and Newport News Nuclear BWXT-Los Alamos, LLC (N3B) (collectively, the Permittees) *Demolition Notification for Fiscal Year 2024 and Quarter Ending December 31, 2023 and List of Buildings and Attachment of Hazardous Materials Descriptions, Hazardous Waste Permit*, (Notification) dated and received August 30, 2023, and referenced by EPC-DO-23-268/LA-UR-23-29513/EM2023-0544.

On October 2, 2023, NMED sent an email to DOE requesting additional information for the buildings associated with the miscellaneous structures planned for demolition listed in the table in Enclosure 2 of the document. NMED received the updated Table in Enclosure 2, *Demolition Notification for Fiscal Year 2024 and Quarter Ending December 31, 2023, List of Buildings and Attachment of Hazardous Materials Descriptions, Revision 1*, on December 29, 2023. The updated table added the requested additional information for the building(s) the miscellaneous structures were associated with.

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Hazardous Waste Bureau - 2905 Rodeo Park Drive, Building 1, Santa Fe, New Mexico 87505 - (505) 476-6000
www.env.nm.gov

NMED has reviewed the Notification and has the following comments:

1. Enclosure 1, page 1.

NMED Comment: Enclosure 1 included SWMU 11-001(b) within 50 ft of the footprint of building 11-0024 but did not include the SWMUs or AOCs within the same footprint, 11-004(a,b,c,d,e) and AOC 11-004(f).

2. Enclosure 2, Revision 1.

NMED Comment: SWMU 21-021 was not included in Enclosure 2, Revision 1, despite being within 50 ft of the footprint of several structures or buildings designated to be demolished in the quarter ending December 31, 2023. NMED notes that SWMU 21-021 covers a very large area in TA-21, including all of MDA A and MDA T.

In future demolition notifications, the permittees must include all the SWMUs and AOCs within the 50 ft footprint of the structure or building designated to be demolished in accordance with Permit Section 1.17.1(4). However, a response to NMED comments is not required.

Investigations are not complete at several SWMUs and AOCs located within 50 feet of the buildings proposed for demolition. The Permittees state that they will ensure that the sampling locations and depths proposed in the approved work plans are not affected by these activities. In the case of adverse impacts to the SWMUs/AOCs where investigations are not complete, the Permittees must document all demolition activities that affect any SWMU or AOC in detail so that any impacts on work proposed at the SWMUs/AOCs can be identified and evaluated.

The Permittees must provide a copy of demolition completion reports, if prepared, to NMED within 30 days after the reports are complete in accordance with Permit Section 1.17.3.

Please contact Mitchell Schatz of my staff, at (505) 690-5910, should you have any questions.

Sincerely,

Ricardo Maestas

Digitally signed by Ricardo
Maestas
Date: 2024.02.07 13:44:50 -07'00'

Ricardo Maestas
Acting Chief
Hazardous Waste Bureau

Robert A. Gallegos and Brian Harcek
February 7, 2024
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December 31, 2023
LANL-MISC

