


Environmental Protection and Compliance Division

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National Nuclear Security Administration

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Symbol: EPC-DO-24-307

Date: November 4, 2024

LA-UR: 24-31492

Mr. JohnDavid Nance, Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, NM 87505-6313

Subject: Response to Review of Demolition Notification for Quarter Ending September 30, 2024 and List of Buildings and Attachment of Hazardous Materials Descriptions

Dear Mr. Nance:

The New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) contacted Triad National Security, LLC (Triad) by email on August 29, 2024, regarding review of *Demolition Notification for Quarter Ending September 30, 2024 and List of Buildings and Attachment of Hazardous Materials Descriptions*. The report provided notice of demolition activities for the period of July 1, 2024, through September 30, 2024. The email stated that the review included use of the geographic information system (GIS) structure layer provided to the NMED-HWB on May 1, 2024. The NMED-HWB noted that several of the structures are not included in the May 1, 2024 GIS structure layer and that some structures are designated with placeholders (“XXX”) in the structure number names. The NMED-HWB also sent a letter dated September 5, 2024, that included the same information as the August 29, 2024 email.

The NMED-HWB letter states:

On August 29, 2024, NMED notified Triad via email of inconsistencies in the 2024 shapefiles. The information provided in the 2024 shapefiles is missing four buildings listed in Enclosure 1 (11-0036, 52-0044, 52-0045, and 72-0085) and does not match the information provided. NMED was able to confirm the information for building numbers 11-0036, 52-0044, and 52-0045 using older shapefiles but would prefer to have complete shapefiles for our records. NMED is requesting updated shapefiles that include these units and any other that may be missing. NMED is also requesting that the names for units 72-XXX2 through 72-XXX5 be updated with the correct structure names.

Triad responded the same day to the August 29th NMED-HWB email and informed NMED-HWB that the issues with the structure layer would be investigated and a response would be provided. The following paragraphs detail the response to NMED-HWB's comment:

Structure 11-0036 was demolished in April 2024 and is not present in the May 2024 shapefile. This structure was first reported in the demolition notification for the quarter ending December 31, 2022, which was delivered to the NMED-HWB on August 30, 2022. Triad will not report on this demolished structure in future demolition reports.

Structures 52-0044 and 52-0045 were demolished in 2023 and they are not present in the structure layer in the May 2024 shapefile. These structures were first reported in the demolition notification for the quarter ending December 31, 2021, which was delivered to the NMED-HWB on August 31, 2021. Triad will not report on these demolished structures in future demolition reports.

Structure 72-0085 was demolished in May 2024. It appears in the shapefile with a "72-XXX5" designation. This structure was first reported in the demolition notification for the quarter ending June 30, 2024, which was delivered to the NMED-HWB on March 28, 2024. Triad will not report on this demolished structure in future demolition reports.

The structures designated as 72-XXX2 through 72-XXX4 are not part of the Demolition Notification. Structures designated in the shapefile as 72-XXX2 through 72-XXX4 are designated in this manner because of the unique way they are tracked through the Los Alamos National Laboratory (LANL) siting process. During the siting process, structures are sometimes given placeholder ("XXX") designation in the GIS structure layer until the siting process and/or the project is complete. These structure designations in the structure layer will not be updated at this time since they are an accurate representation of the siting process within the GIS structure layer. The appropriate groups that control the structure tracking and designations are aware of these placeholder designations in the structure layer and the structure layer will ultimately be updated through the LANL siting process.

Representatives from Triad and the NMED-HWB also met to discuss these issues on October 15, 2024. The discussion included the issues further explained below.

Each demolition notification represents a project forecast anticipated for each quarter. This forecasted report for the quarter ending September 30, 2024 is the projected demolition projects for July, August, and September 2024 and the report was submitted at the end of June 2024. Demolition projects are often reported in multiple quarterly reports because they were not demolished due to planning or budgetary issues. For example, structure number 11-0036 (demolished in April 2024) was first reported on in the quarter ending December 31, 2022 and continued to be included in reports through the June 30, 2024 report. This reporting schedule and approach meets the requirements for reporting in Permit Section 1.17 of the Hazardous Waste Facility Permit (Permit).

A demolition project is removed from the reports when the project has either been 1) completed or 2) cancelled or postponed. In the fiscal year report, demolition projects that were cancelled or postponed are reported as structures that were reported on in the fiscal year and not demolished. Therefore, if a demolition project has been removed from the reports and is not reported as "not demolished" in the fiscal year report, the demolition project has been completed. The fiscal year reporting is included with the quarter ending December 31st report that is submitted in September. The current reporting meets the requirements in Permit Section 1.17.

Conditions and content of the reports required under Permit Section 1.17 were negotiated as part of a Settlement Agreement and Stipulated Final Order (Stipulated Order), dated April 10, 2007. The Permittees are required to provide any demolition completion report when one is drafted but are not required to report completion of each demolition activity. These requirements come from the Stipulated Order, Section 21, Paragraph f, and the NMED-HWB omnibus authority at 40 CFR § 270.32(b)(2), and have been agreed upon with the Permittees.

The Permittees understand that Solid Waste Management Units/Areas of Concern (SWMUs/AOCs) located within 50 feet of the structures proposed for demolition may still require investigation. The Permittees will ensure that the sampling locations and depths proposed in the approved work plans for the SWMUs/AOCs identified are not affected by the demolition activities. Demolition activities that have the potential for adverse impact to the SWMUs/AOCs identified in this notification will be identified, evaluated, and documented.

If you have questions or comments for Triad concerning this submittal, please contact Robert A. Gallegos (NA-LA) at (505) 901-3824 or Jason Hill (Triad) at (505) 551-2218.

Sincerely,

STEVEN STORY
(Affiliate)

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Steven L. Story
Division Leader
Environmental Protection and Compliance Division
Triad National Security, LLC
Los Alamos National Laboratory

Sincerely,

**ROBERT
GALLEGOS**

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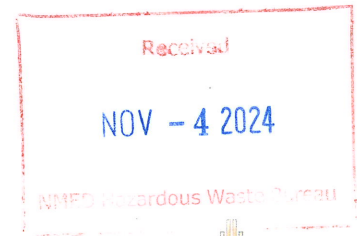
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Program Manager
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