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February 22, 1992

Ms. Kathleen A. Carlson
Area Manager
Department of Energy
Field Office, Albuquerque
Kirtland Area Office
P.O. Box 5400
Albuquerque, New Mexico 87185-5400

Dear Ms. Carlson:

This letter is in response to your letter dated December 30, 1992 to Ed Horst and me regarding confirmation on various issues surrounding "sanitization" of weapons components.

Ed Horst and I met with your staff on November 5, 1992 to listen to an explanation of activities associated with the "sanitization" of weapons components. At that time we discussed various issues which I will now review:

1. Waste Stream. Weapons components (generally the size of a breadbox, but may be larger) that are non-nuclear portions of nuclear weapons that are generally sealed "black box" devices which have an exterior protective housing (generally made of heavy gauge plastic or metal) with external electrical connectors, an internal assembly of electrical/mechanical components (generally mounted on circuit), connected by wire leads or circuit board traces, and potting material (a shock and temperature resistant plastic) which encapsulates the internal components. This waste stream is on-site material only.

NMED comment: This waste stream is solid waste subject to regulation by RCRA Subtitle D. This waste stream is not considered hazardous waste as defined by RCRA Subtitle C.

2. "Sanitization" is declassification of weapons components by crushing with a power forge hammer, hammer mill, shredder, or similar device.

NMED comment: "Sanitization" is not treatment of hazardous waste in this context since the waste stream (weapons components) is considered non-hazardous waste as defined by 40CFR 260.10.

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3. TCLP analysis of the rubble including any fine material resulting from crushing ("sanitizing" of weapons components) exceeded TCLP limits for lead and cadmium for most of the samples tested.

NMED comment: Component rubble has been characterized as hazardous waste as defined by 40 CFR 260.10. Therefore SNL has generated hazardous waste and must meet all applicable requirements of 40 CFR part 262 Standards Applicable to Generators of Hazardous Waste.

4. The component rubble including any fine material resulting from crushing will be collected, packaged, and sent to an off-site permitted TSDF for all required treatment and disposal.

NMED comment: SNL must meet all applicable requirements of 40 CFR Part 263 Standards Applicable to Transporters of Hazardous Waste.

5. Metals such as aluminum, gold, and or steel may be recycled by SNL whenever economically feasible after the "sanitization" process.

NMED comment: SNL must meet all applicable sections of 40 CFR Part 261.6 Requirements for Recyclable Materials.

If you have any questions regarding our understanding of this process, please contact me at 827-4380.

Sincerely,



Barbara Hoditschek
Program Manager
RCRA Permits

cc: ✓ Benito Garcia, Chief, HRMB
Ed Horst, Prog. Mgr., RCRA Compliance
File - Rad