

KAFB 94



Sandia National Laboratories

Thomas E. Blejwas
Director, Environmental Operations Center

Managed and Operated by Sandia Corporation
a subsidiary of Martin Marietta Corporation

Telephone: (505)848-0905
FAX: (505)848-0918

P.O. Box 5800
Albuquerque, New Mexico 87185-1315

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New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
525 Camino de los Marquez, Suite #4
P.O. Box 26110
Santa Fe, NM 87502

Attention: Ms. Barbara Hoditschek and Mr. Cornelius Amindyas

Thank you for your letter dated August 12, 1994, regarding the proposed modifications to the draft open detonation Permit for KAFB in response to our concerns we expressed in a letter to you dated June 3, 1994. The proposed modifications do satisfy three of the four issues that SNL expressed; however, with respect to the waste analysis issue, the proposed verbiage of Module II, Permit Condition B.1 does not quite capture what was agreed upon in the June 30th meeting. **SNL proposes that the permit verbiage be changed from "The manufacturer of the explosive shall provide the Permittee Material Safety Data Sheets (MSDS)..." to "The generator of the explosive waste shall provide the Permittee Material Safety Data Sheets (MSDS) or equivalent technical information ..."**. This simple change is necessary for two reasons. First, because SNL is not a manufacturer of explosives, the permit should require the generator of the explosive waste to provide waste characterization data to KAFB. Second, MSDS's are not always the appropriate waste characterization documents. We apologize if during the meeting of June 30, 1994, we did not clearly articulate that we often use the term MSDS to refer to generic manufacturer-supplied technical information about a product. A MSDS is a specific form required for hazardous chemicals by OSHA which is intended to protect worker health and safety. Although it is often used for waste characterization, it is not the only source of information, and often other sources are better for waste management purposes. If the permit verbiage is changed as stated above, then the waste analysis issue will be resolved and SNL will withdraw its request for a public hearing.

Sincerely,

KAFB1486

