



BRUCE KING  
GOVERNOR

*Permit*  
State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Harold Runnels Building  
1190 St. Francis Drive, P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-2850

*Claudia  
my reading  
side  
into*  
JUDITH M. ESPINOSA  
SECRETARY

RON CURRY  
DEPUTY SECRETARY

October 12, 1994

Thomas P. Grumbly, Assistant Secretary  
for Environmental Management  
Department of Energy  
Washington, DC 20585

Dear Mr. Grumbly:

**RE: PROPOSED ACTINIDE SOURCE-TERM WASTE TEST PROGRAM:  
ENVIRONMENTAL ASSESSMENT; LOS ALAMOS NATIONAL  
LABORATORY, LOS ALAMOS, NEW MEXICO; REVISION 5, U.S.  
DEPARTMENT OF ENERGY, SEPTEMBER 1994**

The following transmits New Mexico Environment Department (NMED) staff comments based on a review of the above-referenced Environmental Assessment (EA).

The EA stipulates that no Resource Conservation Conservancy (RCRA) permit for hazardous waste is needed. The document, however, states that "mixed waste" comprised of a radioactive component and a RCRA hazardous waste may be used in the program. The Los Alamos National Laboratory (LANL) has not contacted the NMED, and more specifically the RCRA Permit Section of the Hazardous and Radioactive Material Bureau (HRMB), for any affirmation on LANL's decision or permit status for this test.

Regardless of the decision on permit status for the test of actinides in a mixed waste stream, the test itself may generate a mixed waste stream with RCRA regulatory concerns. One major issue would be storage treatment and/or disposal of land disposal restricted waste from the test.

We suggest that the persons at LANL projecting to conduct this test contact Ms. Barbara Hoditschek, RCRA Permits Program Manager on the permitting issue at (505) 827-4308. The same individuals should contact Mr. Coby Muckelroy, RCRA Inspection/Enforcement Program Manager, for information on regulatory requirements relative to "mixed waste" generation.

The EA notes possible impacts to the environment and possible health impacts from increased radiation exposure to the general public and LANL workers due to the test(s). However, the EA should also address possible environmental impacts from the disposal of radioactive or mixed waste residuals upon completion of the tests. A two percent increase in waste production would seem to provide potential increases in environmental releases of wastes and potential increases in exposure to the general public,





*State of New Mexico*  
**ENVIRONMENT DEPARTMENT**  
*Harold Runnels Building*  
*1190 St. Francis Drive, P.O. Box 26110*  
*Santa Fe, New Mexico 87502*  
*(505) 827-2850*

*JUDITH M. ESPINOSA*  
*SECRETARY*

*BRUCE KING* Thomas P. Grumbly  
*GOVERNOR* Page 2  
October 12, 1994

*RON CURRY*  
*DEPUTY SECRETARY*

Laboratory workers, and DOE and other sub-contract employees. This should be addressed in the EA for the proposed actinide test(s).

We appreciate the opportunity to comment on this document. Please let me know if you have any questions.

Sincerely,

Gedi Cibas, Ph.D.  
Environmental Impact Review Coordinator

NMED File No. 859ER