

RED LABEL TA-39 97  
TAP 14



**Department of Energy**  
Albuquerque Operations Office  
Los Alamos Area Office  
Los Alamos, New Mexico 87544

MAY 1 9 1997



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Dr. Stuart Dinwiddie  
Permitting Program Manager  
Hazardous and Radioactive Materials  
Bureau  
2044 Galisteo St., Bldg. A  
P. O. Box 26110  
Santa Fe, New Mexico 87505

Dear Dr. Dinwiddie:

Subject: Transmission of Requested Radionuclide Data Related to the DX Division Permit Application for Technical Areas (TA) 14, 15, 36, and 39

The purpose of this letter is to respond to a request from a member of your staff. We are submitting radionuclide data related to TAs 14, 15, 36, and 39 as an enclosure to this letter. We are submitting this information as a courtesy to the State. We realize your bureau, when processing a permit application, wishes to look at the treatment storage and/or disposal operations as a whole. We are also aware that the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Management Regulations (HWMR) do not address the radioactive component of any mixed waste.

We have concerns over how this data will be used in relation to the permit application that was submitted for TAs 14, 15, 36, and 39. Since the radioactive portion of mixed waste is not regulated under RCRA and HWMR, making this data a part of the permit and therefore available to the public through the public participation process might cause unnecessary concerns by the public and provide the impression that this aspect of the waste is regulated.

This submittal is being made as a courtesy and not as an addendum or revision to the permit application for TAs 14, 15, 36, and 39. If you should have further questions concerning this issue, please call me at (505) 665-5042.

Sincerely,

H. L. "Jody" Plum  
Office of Environment and Projects

LAAMEP:2JP-076

Enclosure

cc w/enclosure:  
B. Garcia, Bureau Chief  
Hazardous and Radioactive Materials  
Bureau  
New Mexico Environment Department  
2044 Galisteo St., Bldg. A  
P. O. Box 26110  
Santa Fe, New Mexico 87505



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## Enclosure

- TA-14 - There has not been any radioactively contaminated waste treated at TA-14. The OB treats HE contaminated waste only. Waste burns are conducted approximately 12 to 16 times a year. The OD treats HE contaminated waste only. Waste detonation is conducted approximately 3 to 6 times a year.
- TA-15 - There has not been any waste (hazardous, radioactive, or mixed) treated at this site up to this time.
- TA-36 - There has been Depleted Uranium treated at both the OD sites within TA-36. Approximately 12 detonations per year are performed. The last waste detonation occurred around March 1997.
- TA-39 - There has not been any radioactively contaminated waste treated at TA-39 OD sites. The OD sites are used to treat inventory and scrap explosives (waste explosives). Explosives are inventoried and those that have been determined to have no further use or have exceeded their "shelf life" will be detonated at the OD. This occurs approximately once every 2 years. There is also detonation of scrap explosives from assembling experiments and this waste detonation occurs approximately annually.