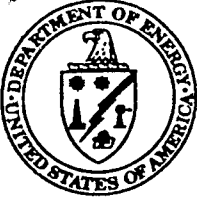


TA 14

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

APR 08 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Bruce Nicholson, Program Manager  
Technical Analysis and Permit Section  
New Mexico Environment Department  
Air Quality Bureau  
1190 St. Francis Drive  
Santa Fe, NM 87502

Dear Mr. Nicholson:

We extend an invitation to the Air Quality Bureau (AQB) to observe and review the Los Alamos National Laboratory (LANL) open burning/open detonation (OB/OD) operations at Technical Areas (TA) 16 and 14. The purpose of the review is to determine whether or not these operations require open burning permits under New Mexico Air Quality Control Regulation (AQCR) 301 - Regulation to Control Open Burning. LANL has not previously applied for a permit because we understood that these operations are exempt from permitting requirements under provision B.3. of AQCR 301.

All of the OB/OD sites at TA-14 and TA-16 are currently regulated under the Resource Conservation and Recovery Act (RCRA), 40 CFR, Parts 260 through 270. All of the OB/OD locations currently have interim status. The Part B permit application for hazardous waste, exclusive of radioactive mixed waste, has been submitted under 40 CFR Part 264, Subpart X. That subpart requires, in part, "Prevention of any release that may have adverse effects on human health or the environment due to the migration of waste constituents in the air..."

The Hazardous and Radioactive Materials Bureau (HRMB) is the governing regulatory entity for RCRA activities at LANL. We are aware that the AQB and HRMB each may have permitting requirements for the same units at LANL, and we would appreciate the AQB's help in coordinating these activities so there will be no conflict between the two sets of requirements administered by the New Mexico Environment Department.

**Background TA-16**

The Fabrication and Assembly Group, WX-3, has operated the TA-16 burning ground for the disposal of waste high explosives, solvents contaminated with high explosives, and equipment contaminated with high explosives for more than 30 years. Flash burning of these materials is the only safe way to dispose of or decontaminate these materials.

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Bruce Nicholson

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The burning ground as a whole, has been operated without a burn permit under an exemption in AQCR 301. Provisions B.3. of AQCR 301 states, "Open burning of explosives material is permitted where the transportation of such materials to other facilities could be dangerous." LANL has interpreted "explosive materials" to include materials contaminated with explosives. The waste high explosives, solvents, and equipment which are flashed burned at TA-16 are too dangerous to transport off-site for disposal.


The burning ground flash pad and solvent pad are typically operated once per week during approximately 40 weeks per year. The Standard Operating Procedures (SOP) for flash pad and solvent pad operations are enclosed.

**Background TA-14**

The Explosives Technology Group, M-1, has operated a small open burning site at TA-14, Q-site for the past 20 years. Waste explosives and explosive contaminated materials which are unacceptable for treatment at TA-16 because of their experimental nature or sensitivity are treated at TA-14. Burning operations occur approximately once per month. The SOP for these operations is enclosed.

We invite you to review the TA-16 and TA-14 burning operations and to discuss the need for an open burning permit with DOE and LANL staff. Please call Steve Fong of my staff at 665-5534 to coordinate your visit.

Sincerely,



Joseph C. Nozella, Acting Chief  
Environment, Safety and Health  
Branch

LESH:3SF-021

Enclosures

cc:

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