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By DCARTER at 11:24 am, Sep 27, 2007



Department of Energy  
National Nuclear Security Administration  
Pantex Site Office  
P. O. Box 30030  
Amarillo, TX 79120



SEP 27 2007

MEMORANDUM FOR: J. Alan Jones, Legal, BWXT Pantex LLC

FROM:

*Johnnie F. Guelker*

Johnnie F. Guelker, Assistant Manager for Environmental  
& Site Engineering Programs

SUBJECT:

Addition of Energetic Materials to Burning Ground List – Hazardous  
Waste Permit 50284 – benzoyl peroxide

Please reference the attached Texas Commission on Environmental Quality (TCEQ) letter dated September 6, 2007, subject as above.

This approval to add benzoyl peroxide to the list of materials processed at the burning ground should be provided to the Waste Operations Department for implementation as needed.

If you have any questions, please contact Craig Snider of my staff at extension 5906.

Attachment

cc w/attachment (via email):

J. Zanger, EC, PXSO

J. Flowers, RCD, BWXT

D. Franklin, WOD, BWXT

RCD/WOD, Records, BWXT

EC:FY07:203;FY07:37347:EC

200700669

Kathleen Hartnett White, *Chairman*  
Larry R. Soward, *Commissioner*  
H. S. Buddy Garcia, *Commissioner*  
Glenn Shankle, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

September 6, 2007

Mr. Jerry S. Johnson  
Assistant Manager for Environmental & Site Engineering Programs  
U.S. Department of Energy, National Nuclear Security Administration – Pantex Plant  
P. O. Box 30030  
Amarillo, Texas 79120-0030

Re: Addition of Energetic Materials to Burning Ground List  
USDOE/NNSA – Pantex Plant  
Hazardous Waste Permit No. 50284  
Industrial Solid Waste Registration No. 30459  
EPA Identification No. TX 4890110527  
WWC Nos. 12133590 & 12133641-1; RN100210756; CN600125009

Dear Mr. Johnson:

The Texas Commission on Environmental Quality (TCEQ) has received your request, dated August 22, 2007 to add the energetic compound, benzoyl peroxide, to the List of Energetic Materials authorized for processing at the Pantex Burning Ground. This request was submitted as required by Provision X.B.2.k of Hazardous Waste Permit No. 50284. Based upon our review of the request, the TCEQ concludes that the addition of the energetic compound benzoyl peroxide to the List of Energetic Materials authorized for processing at the Pantex Burning Ground has fulfilled the requirements of Provision X.B.2.k of Hazardous Waste Permit No. 50284.

Please be aware that it is the continuing obligation of persons associated with a site to assure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC Section 335.4. If these requirements are not complied with, the burden remains with the USDOE/NNSA, Pantex Plant – Carson County to take any necessary and authorized action to correct such conditions.

Should you have any questions, please contact Mr. Michael D. Graeber, P.E., of the Industrial & Hazardous Waste Permits Section at (512) 239-4788. If responding by letter, please include mail code MC-130 in the mailing address.

Sincerely,

A handwritten signature in black ink, appearing to read "EJ" followed by a stylized flourish.

Enoch Johnbull, P.G., Team Leader  
Industrial and Hazardous Waste Permits Section  
Waste Permits Division

EJ/MDG/ff