

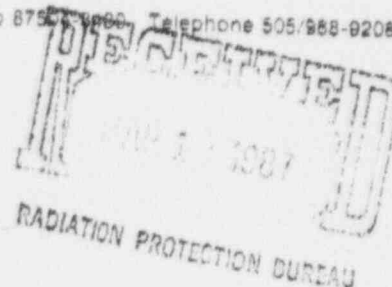
**UNC MINING AND MILLING**

Division of United Nuclear Corporation  
A **UNC RESOURCES** Company

P.O. Box 8480  
Santa Fe, New Mexico 87501-0980 Telephone 505/868-9208



March 6, 1987



Dr. J. Margo Keele  
Program Manager  
Radiation Protection Bureau  
New Mexico Health & Environment Department  
P.O. Box 965  
Santa Fe, N.M. 87501-0968

Dear Dr. Keele,

UNC has completed its review of the inventory list which DOE provided in its January 9, 1987 letter. As we indicated in our meeting of March 3, UNC believes that some of the materials identified by DOE are, in fact, their responsibility to dispose of under Title I of UMTRCA because they are byproduct materials as defined in Section 2014(C)(2) of the Atomic Energy Act, as amended, wherein byproduct materials includes "tailings or wastes produced by the extraction or concentration of uranium or thorium from any ore processed primarily for its source material".

Nonetheless, UNC has identified a number of items that we propose we will remove from the site. The following is a list which indicates what UNC proposes be done with the materials inspected by DOE. As we mentioned at our meeting, our identification of the material does not always agree with DOE's. The list is organized to coincide with DOE's inventory list for ease of reference.

1. Dry Materials - Baroid Quik Gel, Octive Thinner, Kwik Seal, Dicks Mud Seal, Calcium Chloride Flakes, Barite

UNC proposes that it will remove these from the site.

2. Various Lubricants in the mill building.

UNC proposes that it will remove these lubricants together with a number of others identified below. They will be sold for recycling or taken to Churchrock for future use.

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## 3. Ammocoat Paints #66,64 &amp; 78

These are all old paints used in the mill to provide protective coatings for equipment and floors. As such UNC considers them to fall within the definition of byproduct material.

## 4. Drums No. 1A-1F

This is a flocculant which was used in the mill process. UNC considers these to be byproduct materials.

## 5. Drums No. 2,3,4,5,6,7A,7B,8,9,10, &amp; 11

These contain kerosene or oil which UNC proposes that it will remove.

## 6. Drum No.12

This drum contains rainwater with a light scum of residue from whatever was in the drum. UNC believes this to be byproduct material.

## 7. 13A-G &amp; 14

These drums contain lubricants and oil which UNC proposes that it will remove.

## 8. Drums No. 14,15,16,17 &amp; 18

These drums all contain rainwater with a residual scum. UNC believes they are byproduct material.

## 9. Drum No. 19

This drum contains oil which UNC proposes that it will remove.

## 10. Drums No. 20,21, &amp; 22A &amp; E

Drums No. 20 & 21 contain organic phosphate, a water treatment material for the boiler. Drums No. 22A & 22E contains rainwater with a residual scum. UNC believes these to be byproduct material.

## 11. Drums No. 22B,C,D,F,24,25,26,27, &amp; 28

These drums contain oil and antifreeze which UNC proposes that it will remove.

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## 2 12. Drums No. 29 &amp; 30

These drums contain rainwater with scum residual. UNC believes them to be byproduct material.

## 13. Drums No. 31 through 81

These drums contain a variety of oil, antifreeze, transmission fluid and diesel fuel additives, which UNC proposes that it will remove.

## 14. Drum No. 82

This drum contains paint that was used in the mill area. UNC believes this to be byproduct material.

## 15. Drums No. 83, 84 &amp; 85

These drums contain oil which UNC proposes that it will remove.

## 16. Drum No. 86

This drum contains rainwater with a scum residual. UNC believes this to be byproduct material.

## 17. Drums No. 87 through 92

These drums contain oil and floor wax which UNC proposes that it will remove.

## 18. Drum No. 93

This drum contains caustic soda used in the mill process. UNC believe this to be byproduct material.

## 19. Drums No. 94, 95, 96, 97 &amp; 98

These drums contain oil which UNC proposes that it will remove.

## 20. Drums No. 99 &amp; 100

These drums contain caustic soda and soda ash used in the mill process. UNC considers these to be byproduct material.

## 21. Drums No. 101 through 104

These drums contain oil which UNC proposes that it will remove.

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## 22. Unnumbered item labeled sample No. 37.

This item is a tank which DOE identified as a carrier solvent. It is, in fact, 14,000 gallons of sodium chloride stripping solution containing approximately 23 pounds of uranium in solution. This material was used by UNC when it operated the IX plant. UNC suggests that this material be disposed of in the vailings pile. It is a non-toxic material, essentially salt water, with a very minor amount of uranium.

## 23. Drums 23A, B, C, &amp; D

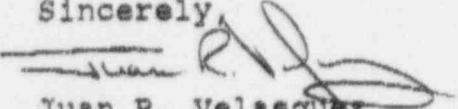
These drums re not on the DOE inventory list. We assume DOE simply forgot them as they were labeled along with the others. They contain used oil which UNC proposes that it will remove along with the rest.

UNC would propose that UNC, DOE and NMEID reach a mutually acceptable resolution of the disposal of the items listed above and would be pleased to meet further with you and DOE after you have had an opportunity to consider this matter.

Regarding an unrelated item discussed at our meeting, we take this opportunity to confirm that the bunkers you questioned are empty. They have been locked for safety and security purposes. If you have additional questions, please contact me at 883-6901. My new address is:

6501 America's Parkway, N.E.  
Suite 1040  
Albuquerque, NM 87110

Sincerely,

  
Juan R. Velasquez  
Manager, Environmental Affairs

JRV/mn

cc: Ron Messenheimer  
Chuck Johnson  
Ed Morales  
Stanley Crout