



BRUCE KING  
GOVERNOR

*KAFB 94*  
State of New Mexico  
ENVIRONMENT DEPARTMENT  
Harold Runnels Building  
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Santa Fe, New Mexico 87502  
(505) 827-2850

*Barbara,  
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JUDITH M. ESPINOSA  
SECRETARY  
RON CURRY  
DEPUTY SECRETARY

September 2, 1994

Mr. Lionel M. Pleasant, Director  
Safety and Compliance  
Controls for Environmental Pollution, Inc.  
1925 Rosina Street  
P.O. Box 5351  
Santa Fe, New Mexico 87502

**RE: Treatability Studies**

Dear Mr. Pleasant:

This is a response to your letter dated August 19, 1994 in which you expressed Controls for Environmental Pollution's (CEP) intent to conduct treatability studies to determine how much toluene, isopropyl alcohol, and tritium are contained in rags, and how much will come off at a low temperature.

In response to the New Mexico Environment Department (NMED) concern about how you plan to handle the products of the treatability studies, you stated that they will be returned to the Kirtland Air Force Base, the providers of the samples. KAFB in turn plans to send the waste or used samples to DSSI in Tennessee for incineration. You added that the experiments will be conducted at picocurie levels of tritium, between 100°C and 110°C so that the reaction products will not disintegrate.

NMED feels that your planned experiments qualify as "treatability studies" because:

- (1) You will be subjecting the hazardous waste to treatment, in order to demonstrate the optimal process conditions to achieve the desired result of removing toluene and tritiated water from cleaning rags;
- (2) You do not plan to commercially treat or dispose of hazardous waste; and
- (3) You intend to determine the characteristics and volumes by quantifying the recovery of toluene and tritium as condensates, sublimated solid or adsorbate.

Based upon the above and the information that you submitted to

KAFB1487



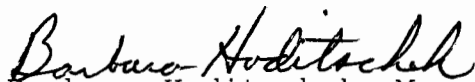
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Mr. Pleasant, CEP  
September 2, 1994

HRMB, NMED hereby grants CEP the permission to carry out the planned treatability studies, but you must first notify us at HRMB in writing, no less than 45 days, of your intention to carry out the proposed studies before you commence the subject treatability studies, In addition, CEP must conduct the subject studies in accordance with the requirements of HWMR-7, Part II, 40 CFR §261.4(f).

NMED also wishes to inform you that although the EPA increased the quantity of contaminated media to be used in treatability studies ten-fold in a recent final Rule (59 FR 34, p. 8362 February 18, 1994) NMED will currently allow only the amounts stated in HWMR-7, Part II, 40 CFR §261.4(f), that is "No more than 250 kg of 'as received' hazardous waste should be subjected to initiation of treatment in all treatability studies in any single day." This will continue until such a time that the State of New Mexico officially adopts the above February 18, 1994 EPA Final Ruling.

If you have any comments regarding this matter you may contact Mr. Cornelius Amindyas of my staff at (505) 827-4308.

Sincerely,



Barbara Hoditschek, Manager  
RCRA Permits Program  
Hazardous and Radioactive Materials Bureau

cc: Benito Garcia, Chief, HRMB  
Terry Cooper, KAFB  
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