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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
INTERFIRST TWO BUILDING, 1201 ELM STREET
DALLAS, TEXAS 75270

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APR 24 1986

HAZARDOUS WASTE SECTION

Mr. Peter Pache, Manager
Hazardous Waste Section
New Mexico Environmental
Improvement Division
P.O. Box 968
Santa Fe, New Mexico 87504-0968

Dear Mr. Pache:

On or about March 5, 1986, I sent to you our comments regarding the completeness and technical adequacy of the incinerator portion of the Part B permit application for Los Alamos National Lab (NM0890010515). Further review has produced additional comments regarding the technical adequacy of the trial burn plan. These comments are listed below:

1. Page 6, Section 6, last paragraph. Los Alamos proposes a two-tier carbon monoxide cut-off system. A better CO cut-off system is to automatically shut off the waste feed when the CO concentration (ppm) exceeds 10 times the percent CO₂ concentration. This is consistent with the shut-off requirements during PCB incineration at Los Alamos and will result in a destruction and removal efficiency (DRE) of 99.99% or higher.
2. Since Los Alamos plans to incinerate F027, a DRE of 99.9999% must be demonstrated during the trial burn on POHCs (Principal Organic Hazardous Constituents) more difficult to destroy than the F027 wastes.
3. Since a DRE of 99.9999% is required for the F027 waste, Los Alamos should spike their waste with the suggested POHCs at concentrations of at least 1% (10,000 ppm).
4. Page 31, Paragraph 2 at bottom of page, POHC Selection Rationale. Los Alamos proposes to spike their liquid and solid wastes with only one POHC, which is carbon tetrachloride. Since Los Alamos plans to incinerate numerous ignitable, U or P listed wastes generated from their laboratories; several other POHC's should be selected for their trial burn. It is recommended that the



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following two chemicals or others of similar characteristics, be selected as POHC's in addition to carbon tetrachloride:

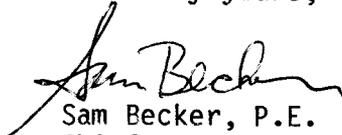
- a. Hexachloroethane (low heat of combustion and condensible organic)
- b. Hexachlorobenzene (low heat of combustion, aromatic and condensible organic)

If these two chemicals are selected as POHC's, Los Alamos will have to utilize the modified method 5 (MM5) sampling train during the trial burn. This is in addition to the volatile organic sampling train (VOST) which Los Alamos plans to use for carbon tetrachloride sampling.

5. For the purpose of auditing the performance of the source measurement systems, Los Alamos should be required to sample and analyze hazardous organic cylinder gases available through the EPA Environmental Monitoring Systems Laboratory. EPA, Region 6 will assist in securing the appropriate audit cylinder when the trial burn schedule is finalized.

If you have any questions, do not hesitate to call me or have your staff call Jamie Wright at (214) 767-6228.

Sincerely yours,



Sam Becker, P.E.
Chief

Hazardous Waste Compliance Branch