

7/26/88  
Permit

Legions of Living Light

Box 351, El Prado, N.M. 87529

Kelly Crossman

N.M. State EID



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1148  
Permit

Howdy, First I'd like to complain about the procedures of this process. Usually there is a time lapse of several weeks after a hearing before the deadline on written comments. The idea that all comments must be rendered by the day of the hearing means that ~~nothing learned at this event can be digested or studied by the public.~~ Please issue a one month or three week extension of this deadline. Your public notice #29 indicates that our comments must be submitted to both Mr. Crossman and ~~also~~ Bill Honker in Dallas to be considered in a final decision. Does this mean i should have sent a copy of my comments to Texas, but it's already too late?

Also I Question the intra-agency communication about this situation. Twice i called Mr. Crossman's office and twice it was hard to find anyone who knew anything about <sup>this hearing</sup> it. The second time a nice lady at Taos EID offices made the call for me and did connect Mr. Robert Kirkpatrick, head of the EID's Air Quality Division. He assured me the incinerator moritorium covers this plant. And said he wrote Los Alamos Labs to inform them that the incinerator project could not re-open until the new regulations are implaced. Mr. Kirkpatrick thinks this hearing is about disposal of fly-ash. Yet after several hours of study of the draft permit, i didn't see the word "fly-ash". Was this subject addressed in that document? Obviously, the soon to be, state incinerator regulations, should require a complete Environmental Impact Statement for each plant.

\* Please get a copy of this letter from Mr. Kirkpatrick and put it into the record of this hearing. Thanks.

Borneau - 4

*Is it true*  
~~heard on the radio~~

that this hearing is for a "final operating permit", ~~and~~ <sup>I</sup> must question the propriety of bypassing the Air Quality Division of the EID. The "draft permit" reads more like a LANL operations manual than an informative document. One section labels unnamed wastes into categories of code designations like D, F, K, P, & U; Another, unnamed semi-solid metallic, free liquid, gas, corrosive acid and reactive.\* Some of these have earned the repute of "established explosives". Were some established in this very fiery furnace? Why did the thing shut down and when? Were there any improvements or renovations during the closure? Have we any assurance that none of these hundreds of agents contain traces of radioactive contamination? The Labs have an established "safe background level" yet if enough of this is air-borne and migrates a distant mountain face, surely the danger will multiply with accumulation. Though the levels leaving the lab may register as safe, or even insignificant, they can pile up somewhere else and create significant, unsafe conditions.

If this permit is for solid waste management, why does it not deal with the solid waste created by the incinerator, i.e. fly-ash? Can you ignore both air quality and solid waste disposal to discuss only operational procedures at the plant? Under "spill kits" the permit does not designate <sup>Quality</sup> specifications or quantity required, but <sup>monthly</sup> inspections to verify location, type, presence, etc. Of course, such inspections are important, but what can be done to clean up "spills" of toxic gases? It was shocking to read that only one in each 2,000 containers would be tested by chemical analysis to verify content. And it would take variations of greater than 25% to warrant

\* Do these designations have any cross-reference?

*Investigation*

According to a HED press release, "The draft permit specifies which chemicals..." And there is a heading in the table of contents called "description of hazardous waste", however the names of the specific chemicals are never itemized. Attachment G is called "Authorized Waste Identification" but instead of obscure latin names, there is a list of code numbers and the over 360 substances remain a mystery. When I asked the lady at Taos EID if this was standard code and if she had a reference to the system, she called Santa Fe. Mr. Kirkpatrick was not familiar with this chemical code either. Is it top secret? Are there many PCB's?

The draft permit says the waste will be in 1,660 gallon tanks with a maximum 5,720 gallons of any waste. There's some funny math here since it says 5,720 would be four 1,660 gallon tanks. Really it's four ~~1,660~~<sup>1430</sup> tanks for 5,720 and four times 1660 is 6640. But this is minor compared to Attachment G which lists most quantities at exactly 1,000 gallons, yet some run as high as 25,000, 50,000, 100,000 and up to 300,000 gallons of two toxins described as D001 and D002. Page A-4 states that there is less than 55 gallons of many substances. None of these are itemized in Attachment G so one must assume that there are many more than the 360 unnamed hazardous wastes it suggests. How many barrels are there of the less than 55 gallon experimental refuse?

Did notice that Figure A-2 was labeled "Waste Compatability" chart, but it was impossible to read because the print was so small. It seemed to have two crossing columns of toxins, one horizontal and one vertical. But there were not 360 + elements in either column. Only 30, or so. Obviously many of these agents will have nasty effects when they contact. Some of the less than 55 gallon collection may be nearly unknown. How is waste compatability assessed?

Will there be any attempt to breakdown a detailed analysis of each and any chemicals, gases, particals, elements and agents released into the air or earth? How will these materials be effected by percipitation, humidity or other natural phenomenon? They should each be studied to determine the effect aquatic life, the food chain, the human respiratory and digestive systems. Could the cumulative effect of so many toxins be ~~so easily~~ dismissed? Of course it is reassuring to know that a prominent Lab scientist and his daughter and grandchildren will be camping on top the smokestack for several months or years to prove it's ~~beneficial health effects~~ *healthful benefits*. But, ~~don't you know that~~ some problems may not become evident until the third generation beyond the experiment? When I mentioned this at last year's garbage incinerator hearings, scientists agreed that such third generation research could be valuable, but they wanted funding. The EID should require third generation studies on all known toxins as a prerequisite to incinerator license.

Read that notice will be required to burn off-site wastes from other than the permittee or it's contractors. If the permittee is DOE and it's contractor the U. of Cal. Regents, may they introduce garbage from outside LANA? Have they ~~already~~ <sup>already</sup> shipped any off-site waste to Los Alamos? Will such notice require public scrutiny or merely be an agency memorandum?

The circular flow charts that clock emissions, ~~you~~ need a trip switch that sets off lights and bells to warn operators when guages indicate danger. Please take seriously the many questions raised ~~today~~ <sup>which</sup> and need for further research, this proposal leaves unanswered.

Yours in peace and light,

*Bonnie Bonneau*  
 bonnie bonneau

p.s. Sorry i did not date the opening section. It was one page a night, July 14-17. Now it's the 24th.

How strange it is that health and environment were not subjects addressed by those hearing officials who represent the Health and Environment Division. Conservation and recovery of any refuse sounds great and ~~they~~ should be discussed lucidly. They may embody the techniques needed to rectify the trash crisis. The disposable pen, plus the disposable diaper, plus the disposable cup and spoon, ad infinitum, leads to the disposable earth. The poisoning of the planet must end. Could there possibly be any evidence that emissions from LANL's Controlled Air Incinerator, or Industrial Incinerator, are beneficial to either health or environment?

Was a toxicologic study ever done on either incinerator? With over 350 chemical agents assigned to the CAI, would separate tests be required to evaluate each? How frightening to realize that the State of New Mexico, Health and Environment Division, seems to care "not one bit" about such details. In the EID hearing it was suggested that incineration may reduce the size and enhance the poignancy of hazardous elements. Hopefully the brilliant chemists and other scientists at LANL will decide to show sincere interest in health. Imagine the research possibilities if standards shift from destruction efficiency to environmental protection. Please refer to the first paragraph on page 4 of this comment for <sup>some</sup> desirable research projects.

Horror, dread! Horror, dread! Not only does Los Alamos have one incinerator already burning radioactive and hazardous waste, but they want to have five incinerators burning the refuse of modern American civilization. Surely multiple stack emissions would have a significant impact to warrant an environmental analysis. I wonder if our "environmental president's Clean Air Laws" will

have any application. Are there any laws proposed to limit point source radioactive releases into the air, earth or water? What if chemical emissions from one plant react with that of another? The cumulative impact of the two existing incinerators must be studied, then extended to consider the effects of three, or more.

Is there a connection between burning corrosive acids and acid rain? Will the Labs dispose of sulfates and other known creators of acid rain in less destructive manners? What about all the oxygen these <sup>incinerators</sup> ~~plants~~ might destroy? Where does it come from? Can <sup>the Lab</sup> ~~they~~ make it from scratch? Does someone need this air to survive? Is it truly dispensable? There are some sick looking Ponderosa pines around Los Alamos. Though some may say it's from an iron deficiency in the soil, have studies been completed to analyze the effects of incinerated toxins on the plants? Can LANL be persuaded to perform some of this important research?

A study of prominent wind currents and dispersal of fine particulates seems vital to any real environmental assessment. I fail to understand how a document resembling an operations manual can be regarded as a functional equivalent of an EIS when the permit does not address environmental impact. <sup>Have</sup> ~~Having~~ studied a few EIS's and though they never address all of the possible environmental impacts they do at least pretend to try. The only way this seems to be a functional equivalent is the volume of hot air. It's like the government can say anything and in fact do anything because they make the rules. Public comment is taken with a grain of salt. Incineration of hazardous <sup>chemical</sup> or radioactive waste is not an environmentally sound practice and should not be represented as such. Please cease!

Thanks a lot. Bonnie Bonneau *Bonnie Bonneau*