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MICHAEL HORAN

JUN 17 1988

HAZARDOUS WASTE SECTION

P.O. Box 2262
Taos, NM 87571
6/16/88

TA-16
C. Kelley Crossman
Hazardous Waste Bureau
NM EID
P.O. Box 968
Santa Fe, NM 87504-0968

Dear Sir,

PUBLIC COMMENT
LANL HAZARDOUS WASTE
INCINERATOR PERMIT

As you have refused to lend the application to NM EID office in Taos for public review for even one day and as you refused to send the application for even one day to the NM EID LANL TA-16 incinerator hearing in Taos to allow public examination of the document, I find the requirement to have to make a full day trip to Espanola burdensome and unreasonable. Why couldn't you send the documents for one day to the NM EID hearing in Taos to allow for public examination and then return them to Santa Fe?

Emissions data from the hazardous waste facility will never be made available to the public. DOE/LANL have never sent us emissions data (increment analyses and SI units conversions) we requested by Freedom of Information Act request during the LANL TA-16 incinerator proceedings.

This is not surprising as we found the TA-16 dioxins emissions to exceed the Swedish dioxins emissions discharge limits by up to 1225 X. Calculations were confirmed by U.S. EPA Control Technology Centre.

TA-16 was the rabbit diversion by LANL to wear us out. The real beast is the hazardous waste incinerator.

What are the LANL hazardous waste incinerator dioxins discharges (2,3,7,8 TCDD equivalences to Eadon's model) given in Ng/Nm³ @ 10% CO₂ dry gas. That is, expressed in nanograms per normal cubic meter and at 0°C, 1 atm., @ 10% CO₂ dry gas.



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Please request LANL to make the calculation and advise.

Also, what hazardous waste minimization procedures is LANL implementing?

At the EID TA-16 incinerator hearing in Taos, I provided ten copies of a U.S. EPA booklet as hearing exhibits, WASTE MINIMIZATION, EPA/530-SW-87-026, Oct. 1987.

This booklet from Dr. Winston Porter's office at U.S. EPA Office of Solid Waste has many good examples of hazardous waste recovery systems.

Has U.S. EPA conducted a waste minimization assessment for DOE/LANL? This service is available from EPA.

Is DOE/LANL employing some of the suggested hazardous waste minimization techniques suggested in Dr. Porter's booklet?

- (1) Are they using cryogenic or bead blasting paint stripping techniques instead of solvents?
- (2) Are they using Dept. of Defense Plastics Media Blasting for paint stripping?
- (3) Are they using ion exchange metal-recovery units to recover heavy metals from plating processes?
- (4) Are they using evaporative recovery systems for metal plating baths?
- (5) Are they using waste solvent recovery systems for hazardous waste solvents such as 1,1,1 trichlorethane?

As DOE/LANL refuses to even attempt to minimize Hg emissions from the TA-16 unit by source separating out alkaline and mercury batteries, the answer to all of the above questions is an emphatic NO! They are not attempting to minimize waste at all. They are not accountable to anyone.

Please enter this letter in comments transcript.

Sincerely,



Michael Horan tel: 758-3522 Taos