

TA 16

**State of New Mexico
ENVIRONMENT DEPARTMENT**



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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 28, 2007

Mr. Daniel E. Glenn, Acting Manager
Los Alamos Site Office
Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, NM 87544

Richard S. Watkins, Associate Director
Environment, Safety, Health, & Quality
Los Alamos National Security, LLC
Los Alamos Research Park
4200 Jemez Road, Suite 400
Los Alamos, NM 87545

**RE: AIR DISPERSION MODEL FOR TECHNICAL AREA 16
LOS ALAMOS NATIONAL LABORATORY EPA ID# NM0890010515
LANL-01-006**

Dear Messrs. Glenn & Watkins:

During a conference call on February 20, 2007, issues related to an air dispersion model for open-burning activities at TA-16 were discussed between the Los Alamos National Laboratory Technical Area (TA) 16 air modeling group and the New Mexico Environment Department (NMED). NMED believes the Permittees' proposed model inputs will not be sufficiently conservative, particularly with respect to "typical" burned quantities versus potential maximum weights per treatment event. Our understanding is that the Permittees prefer to base their analysis on "typical" burn quantities both because operations at the facility have diminished over time (thus obviating the need to over estimate emissions), and because a conservative basis may unduly concern the public.

As you know, NMED is currently processing the Permittees' application for these operations at TA-16. To develop the draft permit, NMED requires that the Permittees base their analysis on the most conservative maximum daily, weekly, and annual treatment volumes found in the permit application. This would include, but not be limited to, the maximum of high explosive treatment weight at both TA-16-399 and TA-16-388 (in the LANL General Part A Permit Application, 250,000 pounds annually) with different maximum weights per single burn. This approach was discussed in the conference call and is consistent with the comparison of air modeling results with appropriate health-based criteria. NMED does not object to inclusion of a



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separate, more "typical" model for comparison purposes. The Permittees must also ensure that the input parameters are consistent between the dispersion and the deposition models.

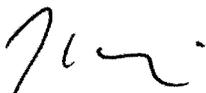
NMED understands the Permittees will alter their application to reflect a reduction of the amount of wastes treated by eliminating the weight of the non-combustible, inert equipment (e.g., HE lathes, cutting tools). NMED also expects the Permittees to model emissions using whatever the application states will be the maximum amount of energetic material per period. NMED requires that any altered application language be submitted with the model report.

In addition, the Permittees must specify a maximum amount of solvent and oil that they will burn annually and during each event, and propose a way to model all associated emissions. Currently the application contemplates the entire amount of consumed waste (250,000 lb) to be solvent or oil. This is problematic as operations at TA-16 are primarily for treatment via open burning of equipment contaminated with high explosive materials and not for liquid (i.e., solvents and oils) waste. The Permittees must verify that all material to be treated contains sufficient explosive compounds to meet the regulatory definition of "reactive" and that the treatment units will not be used to treat VOCs and petroleum products that do not meet this definition. The Permittees must also propose a way to evaluate the worst-case scenario for chlorinated solvents and/or propose a limit to the amount of this type of solvent that can be treated on a daily, weekly, and annual basis.

Finally, pursuant to 74-4-4.3(A) NMSA 1978, NMED requires copies of TA-16 388 and 399 unit operating and inspection records. Your compliance with this request is mandatory. These records must be provided within 15 days of your receipt of this letter.

If you have any questions or comments regarding this letter, please contact Rebecca Kay at (505) 476-6052.

Sincerely,



James P. Bearzi
Bureau Chief
Hazardous Waste Bureau

JPB: rjk

cc: J. Kieling, NMED HWB
D. Cobrain, NMED HWB
S. Pullen, NMED HWB
R. Kay, NMED HWB
M. Smith, Tech-Law

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