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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 4, 1993

Mr. Jerry Bellows, Area Manager
Department of Energy
Los Alamos Area Office
528 35th Street
Los Alamos, New Mexico, 87544

**RE: Notice of Deficiency (NOD) - Technical Adequacy of LANL's
Packed-Bed Reactor/Silent Discharge Plasma (PBR/SDP) Permit
Application
EPA ID No. NM0890010515**

7A 35
The New Mexico Environment Department (NMED) has reviewed for technical adequacy, the December 1992 Research, Development and Demonstration permit application for the Packed-Bed Reactor/Silent Discharge Plasma (PBR/SDP) Unit as required under the Resource Conservation and Recovery Act (RCRA).

After reviewing the permit application and additional support information, the NMED has found the application to be technically deficient. The enclosed attachment lists the required information necessary for NMED to begin preparation of a draft permit.

The information needed in the attachment must be submitted to NMED within thirty (30) days of receipt of this NOD. Failure to submit the required information in this designated time may result in permit denial.

If you have any question concerning the NOD, you may contact Cornelius Amindyas of my staff at (505) 827-4308.

Sincerely,

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

cc: Benito Garcia, Chief, HRMB
Jon Mack, ES&H, LAAO
Tony Grieggs, EM-8, LANL, MS-K490
File Red-93



5124

ATTACHMENT
NOTICE OF DEFICIENCY
Technical Adequacy Review

August 4, 1993

1. Site Location Standards

[HWMR-7, Part IX, 40 CFR, § 270.14(b)(19)(i); (iii) and (v)]

LANL must provide Figures 2 and 5 bearing the dates and legends as well as the words "Figure 2" and "Figure 5" printed on each respective map. Figure 5 must also show the surface waters including intermittent streams. Clearly indicate a wind rose (i.e. prevailing wind speed and direction) on the figures.

2. Design and Operation of Facility

[HWMR-7, Part V, 40 CFR, § 264.31]

Explain the second sentence from the top of page 14 of the application text: i.e. why "the piping from the scrubber to the Building 128 vent... or back to the waste feed... will be constructed of either PVC or copper." Expound on the preferred choice of the use of PVC to the use of copper and vice versa.

3. General Waste Analysis

[HWMR-7, Part IX, 40 CFR, § 264.13]

Demonstrate how carbon monoxide, one of the end products generated by the RD&D treatment will be destroyed or eliminated without posing any danger to human health and the environment.

Provide reaction diagrams that indicate the thermal decomposition of the hazardous wastes during treatment in the combined PBR/SDP unit.