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November 22, 1993

Ms. Barbara Hoditschek
Program Manager, RCRA Permit Section
Hazardous and Radioactive Materials Bureau
State of New Mexico Environment Department
P.O. Box 26110
Santa Fe, NM 87502



**Subject: Draft Research , Development, and Demonstration Permit for the LANL
Hydrothermal Processing Unit, EPA I.D. No. NM0890010515**

Dear Ms. Hoditschek:

Thank you for your notice of October 20, 1993, on the subject Draft Permit. I understand that this technology promises to be an alternative to incineration for reactive hazardous organics.

Operator safety is a concern that must be addressed. ASME design criteria must be applied to prevent accidents and potential exposure of workers and the environment.

Corrosion and erosion of the reactor and other components must be addressed. Corrosion can cause catastrophic failure of the reactor and should be controlled by limiting exposure of the pressure containment to oxygen and flames. Erosion can cause similar problems for high-velocity flow, particularly if solids are present.

LANL should make this facility a Designated User Facility as recommended by the LANL Environmental Restoration/Waste Management Program office, to allow participation by private industry in development and commercialization of this promising technology.

These recommendations will help to protect workers and the environment, in addition to enhancing LANL's participation in business development for New Mexico.

Sincerely yours,

Kathy Tolman
President

Cy:

Ernie Daman, Past President, ASME, c/o FWDC, FAX (201) 535-2242

