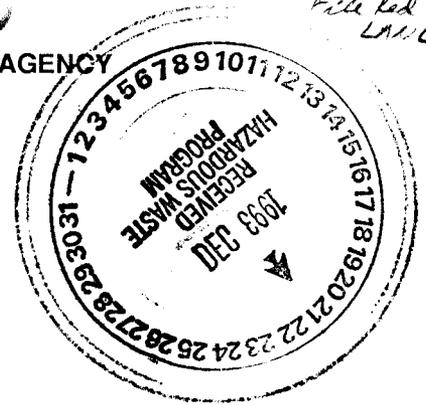




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733



*Handwritten notes:*  
File Red  
LAW

*Handwritten:* 7-35

DEC 14 1993

Ms. Barbara Hoditschek  
RCRA Permits Program Manager  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
525 Camino De Los Marquez  
P.O. Box 26110  
Santa Fe, New Mexico 87502

Re: Research Development and Demonstration Draft Permit  
Packed-Bed Reactor/Silent Discharge Plasma unit  
Los Alamos National Laboratory, NM0890010515

Dear Ms. Hoditschek:

Enclosed are the comments made by the Environmental Protection Agency (EPA) on the draft permit for the Packed-Bed Reactor/Silent Discharge Plasma (PBR/SDP) unit which will be used in experimental destruction of hazardous waste generated at Los Alamos National Laboratory. Should you have any questions on these comments, please contact Barbara Driscoll at (214) 655-7441.

Sincerely,

*David Neleigh*  
David Neleigh, Chief  
New Mexico/Federal Facilities Section  
RCRA Permits Branch (6H-PN)

Enclosure



*Handwritten:* 2

## COMMENTS

1. Upon completion of this Research, Development and Demonstration (RD&D) project should Los Alamos National Laboratory decide to permit a permanent PDB/SDP unit it will need to be permitted as an incinerator under 40 CFR 264 Subpart O and should also meet the requirements of EPA's Combustion Strategy.
2. In addition, the permit regulatory limits in Subpart O need to include, but are not limited to the following items:
  - a. What parameters need to be measured to ensure that the waste feed cuts off if the unit is not operating within specifications?
  - b. The amount and type of anticipated emissions need to be defined. How will LANL know when complete combustion has occurred. These parameters need to be defined.
3. On page A3, the indented paragraph on monitoring indicates that monitoring could be operated continuously during the RD&D experiments, but it may not be necessary. Monitoring should be continuous or else there is no way to determine if the process is stable or not. EPA is concerned that if monitoring is not continuous then the waste material is being burned for destruction purposes and not RD&D.
4. There are two typos on page C2, second paragraph, sentences 3 and 5 do not start with capital letters.
5. On page C8, under the section entitled, "Objective", paragraph three indicates that the wastes in storage at LANL are described in Attachment 11. There is no Attachment 11 in the permit.

L  
(C.A.)  
12/21/93