

## State of New Mexico

## 'NVIRONMENT DEPARTMEN

Harold Runnels Building 1190 St. Francis Drive, P.O. Box 26110 Santa Fe, New Mexico 87502 (505) 827-2850

JUDITH M. ESPINOSA SECRETARY

> RON CURRY DEPUTY SECRETARY

December 17, 1993

Ms. Kathy Tolman, President League of Women Voters of Santa Fe 440 Cerrillos Road Suite G Santa Fe, New Mexico 87501

Comments on the Research, Development and Demonstration Hydrothermal Processing Unit (RD&D2) draft Permit

Dear Ms. Tolman,

This is to acknowledge receipt of your letter and comments of November 22, 1993 regarding the Los Alamos National Laboratory (LANL) Research, Development and Demonstration Hydrothermal Processing unit draft Permit. Your comments and concern about Operator safety with reference to the physico-chemical properties and characteristics of equipment to be used in the experiment by LANL will be considered by the New Mexico Environment Department during the final determination of the draft Permit.

If you have further questions concerning this issue, you may contact Mr. Cornelius Amindyas of my staff at (505) 827-4308.

Sincerely,

RCRA Permits Program

Hazardous and Radioactive Materials Bureau

File Red, 1993 cc:

## RS OF SANTA FE COUNTY

Cornelin

440 Cerrillos Road Suite G

Santa Fe, New Mexico 87501 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,

athy Tolmen

Kathy Tolman

President

Cy:

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