

Taos Meeting on LANL Incinerator 9/16/88

1. ^{What} ~~What~~ materials will be burned in the incinerator?
~~CONFIDENTIAL~~ P.A.
2. Who can provide the information on ~~what~~ what materials will be burned?
3. Does NRC regulate the wastes excluded from EPA/EID regulation?
4. Does EID regulate incineration of elements heavier than Uranium?
5. What is the difference between toxic and hazardous wastes?
6. What is the full name of RCRA?
7. Is the waste minimization program part of the Part B Application?
8. Please explain "liability surety".
9. Are there any hazardous waste regulations governing air quality impacts?
10. Is EPA currently working on air quality regs for incinerators?
11. How long does it take EPA to promulgate a new regulation?
12. How far along is EPA in drafting air quality regulations (for hazardous waste incinerators)?
13. Was there an impact statement for the LANL incinerator emissions?

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TAL

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14. If this plant goes into operation, does that mean it gets grandfathered in under less stringent air quality regulations than may exist in the future? (I.e., will it have to meet new regs as they are issued?)
15. ~~Whether~~ Is the mixed waste incinerator an existing facility?
16. Are EID's responses to citizens' comment ~~assess~~ ^{made} before the permit is issued?
17. Is an interim status facility ever subject to the stricter RCRA regulations?
18. Do you have the design plans for the incinerator?
19. Does the incinerator use carbon filtration for emissions control?
20. Does the trial burn measure particulate loading downstream?
21. What was the actual ~~the~~ emission rate recorded during the trial burn?
22. Does the plant meet California emission standards for incinerators?
23. What is the standard applicable to LANL?
24. Is this a standard set by EPA?
25. When was the test burn conducted?
26. When is the next particulate test?

27. Are emissions actually tested right at the stack?
28. Is there a provision for continuous monitoring?
29. ~~What~~ What do they do about plugging of the carbon filters?
30. Does the plant ever "dump to atmosphere" (bypass emissions control)?
31. When was the emissions control system designed - is it state of the art?
32. Is there any regulatory requirement for the plant to add new, superior technologies as they are developed?
33. What are the inspection requirements?
34. What is burned in the explosives incinerator?
35. Is there lead in the explosive material?
36. ^{Does} ~~the~~ explosive waste that also contains hazardous materials fall under regulation?
Could it be a source of unregulated air pollution?
37. Is there a summary of chemicals in the stack emissions available?
38. How are stack emissions measured - by weight, volume?
39. Is the trial burn repeated every year?
40. ~~Who~~ Who regulates/monitors the trial burn?

41. Can EID add its own emission standards - i.e. for metal removal?

42. ^{Do} ~~Are~~ any of the wastes currently being incinerated have potential for being recycled? Are there any ~~amendments~~ ^{regulations} requiring recycling? What criteria are used to determine if the recycling effort is adequate?

43. To whom do we address our recycling concerns?

~~44~~

42. Has DOE-LANL looked at alternatives to incineration? Can EID request LANL to make a public presentation on alternatives?

~~43~~

43. What is status of biological treatment at LANL?

44. How can we get a list of radioactive isotopes to be incinerated?

45. What is the current status of the permits for the two existing incinerators?

46. Does LANL have to meet the current standards once the permit is issued?

47. Since LANL volunteered to meet the CA standards on the municipal incinerator, can we make them meet those standards on the radwaste incinerator?

48. What is the difference between the trial burn & the reverification burn?

49. Can we appeal the permit?

50. If we want tougher regulations, do we have to go ~~to~~ to the legislature?

51. LANL says it may use the incinerator for other purposes. Will those other purposes impair the incinerator's performance?
52. If you only re-test the incinerator once every 2 years or so, how will you know if it's meeting the standards?
with the waste
53. What have they done while the incinerator has been "down"?
54. Aren't EPA's land disposal standards getting stricter every year? If so, why are the incinerator standards set in '74 still being used?
55. When was the clean air act passed?
56. Is there any provision for adjusting regs to keep up with new technological developments?
57. Do you have any regulatory authority over WIPP?
hazardous waste
58. Where can we get a short summary of stack gas concentrations - acids, dioxins, furans, mercury etc?
59. How many incinerators are there, and which are subject to EID regulations?
60. Does LANL list the ingredients to be incinerated on the permit application?
61. If you don't burn the most hazardous substances during the trial burn, how can you justify calling it a trial burn?
62. Can you add an additional emissions requirement if you can identify a health risk?

TAOS Public meeting on LANL incinerator

TA 50

- 1) Are the things that are on the "not covered" list going to be burned in incinerator?
~~we don't know~~
- 2) Where do we find out that info as to what's burned? DOE at LANL
- 3) Do you regulate isotopes heavier than uranium?
- 4) What is the distinction between H.W and Toxic waste? 2 laws passed by congress about defination
H.W \approx 400 chemicals (acids solvents etc)
toxic waste.
- 5) What does security plan involve?
- 6) Is waste minimization part of the Part B permit app?
we are not authorized to permit waste minimization
EPA will be looking at this
- 7) What is the liability surety?
Must have a surety mechanism set aside for any government or state functions!
- 8) What arrangements are made for monitoring these units?
- 9) Is there anything about air quality impact?
Dennis like a major overlook! Kelly response says his opinion is that a matter of priorities, can only be one thing at a time.

- Does ^{to process something like}
- 10) How long will it take for EPA to incorporate air quality as a regulated guideline? about 1 year
 - 11) How far are they along now? and is it currently in effect.
 - ? ⇒ 12) In connection with LAUL permit app was there something about air quality emissions?
 - 13) If plant is built are there no air quality standards being monitored?
 - 14) Is the mixed waste incinerator an existing facility? yes
 - 15) Do you get a response ^{on questions} (mail) before decision is made?
 - 16) You said that incinerator was grandfathered in does that mean it will not be in final permit decision
 - 17) Does it operate under transuranic waste burning?
 - 18) The filters are carbon filtration?
 - 19) What were the results in comparison to the standards for test burn?
 $.024 \text{ grams / dry td Ft}^3$
 $\text{H}_2\text{ max } .08''$
 - 20) Where is that stack located? In the 40CFR part 264
 - 21) When was the test burn conducted? Labor Day 2 years
 - 22) When will be next test for particulate loading?
 - 23) Is this an actual stack sampling?
 - 24) So there is no plan for continuous monitoring of constituents?
 - 25) When sample emissions is it wide at the stack?
 - 26) What happens to facility when have plugging of carbon beds?

- in response to
salon beds.
- 27) Do they dump to atmosphere?
 - 28) when was scrubbing system ~~designed~~ designed? late 70's or 80's
but technology is evolving.
 - 29) are there any regulations that require them to
adapt new technologies as they come along? No
 - 30) Does the industrial incinerator have some
scrubbing system? No.
 - 31) Is there any modern monitoring devices on that incinerator
esp don't require anything to be monitored.
 - 32) What kinds of waste emissions come out of the
industrial incinerator?
 - 32) Wouldn't there be a certain amt of lead coming out
of burning explosives?
 - 33) If explosive was contained with regulated components
could it then be regulated?
 - 34) ∴ this could be an unregulated major source of Air pollution
 - 35) Monitor ~~partic~~ particulates but do you monitor gases?
on third burner?
 - 36) Is there a summary of content of stack emissions?
 - 37) Are these stack gas concentrations based on burning volume?
 - 38) are the 90 tags destruction efficiency based on
wet weight?

couldnt hear → 39)

40) Does EPA regulate this case? No this falls strictly under state.

couldnt hear → 41)

Are any of the H.W.

couldnt hear
real good → 42)

are there any requirements to minimize this waste?

43) Are there definite reg that says they have to minimize
by so much etc? up to regulators to look at
generator's minimization proposal.

- 44) What type of criteria are there to see if these burning + minimizing efficiently?
- 45) Who would you address about reauthorization?
- 46) Has LANL looked at other options other than incineration?
There is some R+D literature but LANL specifically haven't pursued cause don't have authority.
- 47) Could EID request DOE + LANL make presentations on other alternative technology? We could request but not order.
- 48) Do they consider Bio Treatment as alternative?
So may be amenable to bio but not economically practical.
- 49) What are the alternatives they are looking at?
- 50) Is assessment of alternatives required under RCRA?
- 51) How do they get a list of radioactive ^{isotopes} ~~isotopes~~ to be incinerated?
- 52) I think be asked when will the draft permit be ready?
- 53) What does draft permit cover?

Didn't hear

went outside →

- 54) Another trial burn is scheduled when?
- 55) What's difference between trial burn and ~~periodic~~ periodic justification? ~~difference in justification~~
- 56) People can also appeal the permit?
- 57) If they modify the waste ~~isotopes~~ are burned can they still operate?
- 58) How would you know if they burn anything different?

- 59) If these efficiency is impaired and we only inspect once every 2 years? They must have records for everything.
- 60) What enforcement action was taken on LAMP in past?
- 61) What are they doing with waste in meantime & until granted permit? Shipping it off.
- 62) Are deposit regs getting more stringent each year? Why haven't incinerator stds getting more stringent?
- 63) When was clean air act put into effect? are there any provisions for new developments?
- 64) Does the H.W. sector have any reg^{enforcement} to look after radioactive waste being sent to the WIPP site?
- 65) Can they get a 1 py summation of emission gases?
- 66) Did they list ~~any~~ ^{all the} regulated material going into the incinerator?
- 67) If only using surrogates how can you be sure results of trial burn will be representative of all the waste going in there?

could be
line 68)