

*Kelley*

P.O.Box 2262  
Taos, New Mexico 87571-2262  
3 October, 1988

Mr. James Phoenix  
Donna Lacombe  
U.S. Dept. of Energy  
Los Alamos Area Office  
528 35th Street  
Los Alamos, NM 87544



LANL MIXED WASTE  
RADIOACTIVE WASTE INCINERATOR

Further to our meeting at your offices on 30/9/88, this is to request permission for David Bates and I to personally visit and inspect the LANL mixed wastes radioactive waste incinerator.

I understand that the carbon bed filters are installed in parallel and that when the carbon bed is contaminated by volatile organic compounds or plugged by fine ash particles, they switch to the parallel filter. My assumption is that the carbon bed filters were long inoperative and they dump to atmosphere after passing through the HEPA filter.

Also, it is my understanding from C. Kelley Crossman of NM EID hazardous waste bureau that DOE/U.C. LANL has never conducted a "6 nines" DRE destruction test pursuant to 40 CFR Ch. I (7-1-87 Ed.) 264.343 Performance Standards (2) and that you have never conducted an HCl stack gas sampling test pursuant to 40 CFR Ch. I (7-1-87 Ed.) 264.343 Performance Standards (b).

Would you please explain your reasons for these violations of U.S. government federal laws.

I also understand that the particulates levels from the "4 nines" test burn were .024 gr/dscf. This violates the State Of California Air Resources Board particulates guidance stack gas limit of .008 gr/dscf for municipal waste combustors.

Lastly, you have never made a stack gas sample for 2,3,7,8 TCDD dioxins and furans or for any of the heavy metals on this facility; the manifests are probably lost or never existed and my assumption is that you are just dumping in unidentified wastes and hoping for the best.

Yours sincerely,

Michael Horan  
tel: 758-3522 Taos

*TR*

cc: Marc Sides, EPA, 6H-CP, Dallas  
✓ C. Kelley Crossman, NM EID, Haz. Wastes Bureau  
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MICHAEL HORAN

P.O. Box 2262  
Taos, NM 87571-2262  
3 October, 1988

Marc Sides  
6H-CP  
U.S. EPA  
Region VI  
Dallas

Dear Marc,

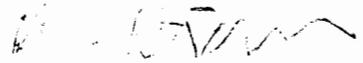
PUBLIC COMMENT  
LOS ALAMOS NATIONAL SCIENTIFIC LABORATORY  
LOS ALAMOS, NM  
RADIOACTIVE & MIXED WASTES INCINERATOR

Enclosed, please find copies of a Title III SARA report filed by DOE/LANL to U.S. EPA indicating wastes stored at LANL and copy of letter to DOE Los Alamos noting violation of federal laws on the mixed waste incinerator and requesting appointment for personal inspection visit of the incinerator.

I want to personally check the gauge pressure drop across the carbon bed filters and compare the gauge pressure drop to the plant specifications operations manual; also, to observe the switching procedure between the carbon filters.

The failure to perform the "6 nines" DRE test and HCl sampling tests pursuant to requirements of 40 CFR Ch. I (7-1-87 Ed.) 264.343 is sufficient grounds for DENIAL of a RCRA permit to operate and grounds for closure and dismantling of the entire incinerator with all liability and costs to accrue to DOE.

Yours sincerely,

  
Michael Horan  
tel: (505) 758-3522 Taos

cc: C. Kelley Crossman, NM EID Haz. Wastes Bureau, Santa Fe, NM

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