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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TEXAS 75202

DEC 22 1988

REPLY TO: 6T-AS

Mr. John G. Themelis  
Director  
Environmental and Health Division  
Albuquerque Operations Office  
U.S. Department of Energy  
P. O. Box 5400  
Albuquerque, New Mexico 87115

RE: National Emission Standards for Hazardous Air Pollutants (NESHAP),  
40 CFR Part 61, Subparts A and H, Standards for Radionuclide  
Emissions from Department of Energy (DOE) Facilities

Dear Mr. Themelis:

My staff have completed their review of your application dated November 1, 1988, for approval to construct a new stationary source of radionuclide emissions at the existing DOE facility of the Los Alamos National Laboratory (LANL), Los Alamos, New Mexico. The LANL facility and the proposed new source construction are subject to the Federal standards for radionuclide emissions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 61, Subparts A and H.

Specifically, your application is for approval to construct the low-level-waste/mixed waste (LLW/MW) incinerator, to accomplish the following objectives:

- 1) volume reduction and physical stabilization of low-level radioactive waste and mixed waste residues.
- 2) thermal destruction of chemical constituents of mixed waste, and
- 3) disposal method for biological and other combustible problem wastes generated by the Laboratory.

Under Subpart H, we consider the entire LANL site to be the facility so that the proposed activity is a "modification" to the existing facility and not the "construction of a new facility".

The maximum annual dose commitment to the nearest off-site resident, from the LLW/MW incinerator, is projected to be only 0.0012 millirem per year to the bone surface. This maximum dose from LLW/MW incinerator operations is negligible compared to bone surface dose from the entire LANL site activities in 1987 at this point (of maximum dose from LLW/MW incinerator operations), which is only 0.2% of the standard. At East Gate, the point of maximum bone surface dose from 1987 operations at the LANL site, LLW/MW incinerator operations would also cause a negligible increase in the annual dose commitment, which is 15.8% of the standard. When projected doses from other



approved (but not yet operating) new sources are added, the annual dose commitment at this point would not be significantly increased. Whole body and other organ doses projected to result from LLW/MW incinerator operations are not significant compared to doses from 1987 operations.

Based on our review of information received in your application, Region 6 of EPA has determined that the proposed LLW/MW incinerator new source, when constructed and operated as described in the application, will not cause emissions in excess of the requirements and provisions of 40 CFR Part 61, Subparts A and H for radionuclides. Approval is hereby granted for your November 1, 1988, application to construct the LLW/MW incinerator at the Los Alamos National Laboratory, Los Alamos, New Mexico. This approval is granted solely under Section 112 of the Clean Air Act, and implementing regulations at 40 CFR Part 61, and in no way affects approvals or activities required by other Federal or state regulatory authorities. Notification of this approval will be published in the Federal Register.

Certain sections of 40 CFR 61 Subpart H, needed to determine compliance, have not yet been promulgated and include:

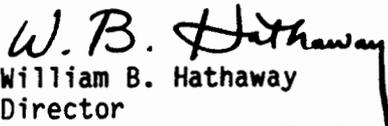
1. List of approved emission monitoring methods, at §61.93;
2. Recordkeeping, at §61.95; and
3. Organ weighting factors, at §61.97(c).

Please be informed that the "emission monitoring methods" of the application approved by this letter are subject to revision when the reserved sections of Subpart H are promulgated. In event of any conflict between Subpart H, as promulgated, and DOE's application of November 1, 1988, or this letter, the standard shall take precedence when finally promulgated and made effective.

All notifications and reports required by applicable NESHAP should be sent to:

Mr. William B. Hathaway, Director  
Air, Pesticides and Toxics Division (6T)  
U. S. Environmental Protection Agency  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Sincerely yours,

  
William B. Hathaway  
Director  
Air, Pesticides & Toxics Division (6T)

cc: Richard J. Guimond (ANR-458)  
Terrance A. McLaughlin (ANR-460)  
Pamela G. Saunders (EN-341)  
Celia Clayton (NMEID)