



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75202

May 9, 1989

Mr. Boyd Hamilton, Program Manager  
Hazardous Waste Section  
Environmental Improvement Division  
The Health and Environment Department  
P.O. Box 968  
Santa Fe, New Mexico 87504-0968

RE: Los Alamos National Laboratory Draft Permit  
Los Alamos, New Mexico NM0890010515

Dear Mr. Hamilton:

On April 15, 1989, the Environmental Protection Agency, Region 6, received a draft permit for Los Alamos (EPA Identification Number NM0890010515) prepared by the New Mexico Environmental Improvement Division. This document establishes provisions for the storage, treatment, and incineration of hazardous wastes.

We have completed a review of the draft permit and offer the enclosed comments for your consideration. The comments address the criteria for issuing a Resource Conservation and Recovery Act permit to the facility, and include administrative and technical comments, as well as specific permit provisions.

If you have any questions, or if we can assist you further, please contact me or Richard Mayer of my staff at (214) 655-6785.

Sincerely yours,

William K. Honker, Chief  
RCRA Permits Branch

Enclosures

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MAY 15 1989  
HAZARDOUS WASTE SECTION



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COMMENTS ON DRAFT PERMIT  
LOS ALAMOS NATIONAL LABORATORIES  
NM089010515

1. **Page 14; Module I.D.9.:** A condition needs to be included in the draft permit which includes retaining of records for all monitoring activities (40 CFR 270.30(j)).
2. **Page 15; Module I.D.:** A condition needs to be added to the draft permit requiring the permittee to report orally any non-compliance which may endanger human health or the environment within 24 hours from the time the permittee becomes aware of the circumstances (40 CFR 270.30(1)(6)).
3. **Page 18; Module II.H.:** A condition needs to be added to the draft permit to require arrangements with the local authorities (40 CFR 264.37).
4. **Page 29; Module IV.C.:** This provision needs to be expanded to include the design of the secondary containment system (40 CFR 264.193(b-f)).
5. **Page 30; Module IV.D.1 & 2.:** There needs to be a condition in the draft permit for appropriate controls for spill prevention and overflow prevention for tanks (40 CFR 264.194(b)(1) & (2)).
6. **Page 33; Module V.A.2.:** This provision needs to be expanded to include a mechanism to determine compliance such as CO, O<sub>2</sub>, and temperature requirements.
7. **Page 34; Module V.A.d.:** It appears that the word "not" is missing between the words "may" and "be".
8. **Page 35; Module V.F.1.:** This condition needs to be expanded to include how the chlorine is measured, how often is it measured, and that records are kept on those measurements.
9. **Page 35; Module V.F.2.b.:** This condition needs to be expanded to include how these numbers are measured, the frequency of measurements, and that records are kept on these measurements.
10. **Page 36; Module V.F.5.a.:** This condition needs to be expanded to read as follows: The incinerator shall be brought to operating temperature in both the primary and secondary combustion chambers before hazardous wastes are introduced and shall be maintained at the proper temperatures, CO, O<sub>2</sub>, so long as any hazardous waste remains in the incinerator.
11. **Page 36; Module V.F.5.b.:** This condition needs to be expanded to include an accuracy of  $\pm 3\%$ , with continuous measurements and recordings.
12. **Page 36; Module V.F.5.c.:** This condition needs to be expanded to include an accuracy of  $\pm 3\%$  for the secondary chamber operating temperature.
13. **Page 36; Module V.F.6.:** This condition needs to be expanded to include how the ECS solution is measured and that it is recorded.

14. **Page 36; Module V.F.6.b.:** This condition needs to be expanded to include how the ECS solution will be measured, with an accuracy of  $\pm 3\%$  and that it be continuously recorded.
15. **Page 36; Module V.F.7.a.(i) & (ii):** These conditions need to be expanded to include how these parameters are measured and that they are recorded.
16. **Page 36; Module V.F.7.b.:** It is questioned whether the facility has a sophisticated cutoff device to comply with the requirements of this condition. This condition needs to be clarified.
17. **Page 36; Module V.F.7.c.:** This condition needs to be expanded to include: a feed cutoff mechanism, how are these parameters measured; and are they recorded continuously. Also there needs to be an accuracy requirement.
18. **Page 36; Module V.F.8.a.:** This condition needs to be expanded to include each monitor specification and required accuracies. Each monitor should be listed with each corresponding requirement.
19. **Page 37; Module V.G.1.:** The last four words of ("analyzed for alternate disposition") this condition needs to be further explained as to their meaning.
20. **Page 37; Module V.H.:** There should be a condition placed in the draft permit which requires emergency equipment be tested (40 CFR 264.347(b)).

#### General Comments

1. Most of the comments numbered 6-18 are concerned with incinerator enforceability issues. Attached are some incinerator conditions from another permit. This should give some insight on the wording of incinerator conditions for stronger permit enforcement.
2. EPA will comment on the revised attachments in the permit during the public notice period.