

P.O. Box 2262
Taos, New Mexico 87571-2262
5/29/89

NMEID
Mr. C. Kelley Crossman
Supervisor
Hazardous Waste Bureau
1190 St. Francis Drive
Santa Fe, NM 87503

RECEIVED

MAY 31 1989

Dear Mr. Crossman,

Operator: UNIVERSITY OF CALIFORNIA REGENTS
LANL TA-50 UNIT
CONTROLLED AIR RADIOACTIVE WASTES INCINERATOR
RCRA OPERATING PERMIT #NM0890010515-1
May 1989
Public Comment

HAZARDOUS WASTE SECTION

The following comments are requested for response in writing from U.S. EPA/
NM EID and from LANL staff at the public hearing June 13, 1989 in Santa
Fe.

Page numbers are referenced to the draft permit document:

(1)

page -35. HEPA Filters. It is my understanding that a carbon bed filter will remove radioactive elements, including Pu-238, Pu-239, Pu-240, tritium, etc. in the flue gas stream. What is the minimum gauge pressure drop across the carbon bed filter specified by the manufacturer. What is the frequency of verification of the pressure drop? Is it each shift?

When the carbon bed filter becomes plugged with radioactive pu or contaminated particulates how is the carbon bed filter regenerated? Is it purged with inert gas?

What is the specified frequency for carbon bed regeneration purging?

How frequently are the carbon bed absorber nozzles removed and inspected?

What is the disposal method for radioactive fly ash from the carbon bed filter purging?

(2) page A-9 Radioactive Scrubber Water

What happens to the radioactive scrubber water? It says the scrubber water "will always be within the discharge guidelines established under the NPDES permit for the Ta-50 radioactive treatment system thereby negating chemical analysis!" Does this mean that LANL will obtain a RCRA "delisting" from U.S. EPA for the scrubber wastewater?



LANL TA-50 Unit Radioactive Wastes Incinerator
RCRA NM #08900010515-1 (cont.)

Is there in effect a memorandum of prior understanding, pre-dating the draft permit between LANL and U.S. EPA for a RCRA "delisting" for the scrubber radioactive wastewater?

What is the maintenance checklist for the scrubber each shift, monthly and annually?

(3) ref: Permit Attachment K, NM EIB-HWMR-5, #301
and 40 CFR, Ch. I, part 262.42 (7)

40 CFR Part 262 is incorporated as Part III of the NM Hazardous Waste Regulations. 40 CFR, part 262.42 ,(6,7)requires(6) "a description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated. (7) "a description of the changes in the volume and toxicity waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984."

Is this waste reduction report to U.S. EPA available for public examination?

For example, what types of biodegradeable solvent replacements is LANL now using as replacements for chlorinated halogenated solvents and for chlorofluorocarbon solvents? What reduction in chlorinated solvents volume has been achieved by the use of biodegradeable solvent replacements?

What is the volume reduction achieved, for example, in heavy metals through use of ion exchange metal recovery systems?

What is the volume reduction in cyanide containing water by use of reverse osmosis systems?

I herein request to receive a copy of the waste reduction report to U.S. EPA required by 40 CFR, Ch. I, part 262.42 (6) & (7).

As LANL has recently refused to provide even one waste 55 gallon drum for use as staging containers for community recycling in Taos County and as Dr. Jim Kane at University of California, Berkeley, the U.C. liason between LANL and President Gardner's office, did not ever respond to the request for community recycling containers, what precisely is the U.C. and LANL response to 40 CFR, Ch. I, part 262.42 (6) and (7).? If LANL is unwilling to donate several waste drums to Taos County for community recycling, their response to 40 CFR, Ch. I part 262.42 shall indeed be interesting at the public hearing on June 13, 1989.

cc: Mr. Bill Honker, U.S. EPA
RCRA Permits Branch, Dallas

Sincerely,


Michael Horan
Taos, NM

tel: (505) 758-3522

Response to Mr. Michael Horan's 5/31 Letter to NMEID Re: Los Alamos Controlled Air Radioactive Waste Incinerator RCRA Operating Permit #NM0890010505-1

Item #1 - HEPA Filters:

The Carbon Bed Adsorber was originally installed in the CAI offgas treatment line as part of a research project to study the fate of various fission activation products during incineration. Its primary purpose at that time was for capture of Iodine 131 that might pass through the upstream offgas treatment components. It is not now, nor has it ever been, intended to serve as a filter or control device for PU-238, PU-239, PU-240, or any other particulates in the offgas stream. The sole reason this component has been retained in the present incinerator design configuration is that, due to offgas duct piping constraints between the primary HEPA filter banks and the Carbon Bed, EPA Method 5 isokinetic sampling associated with the RCRA Trial Burn could only be made in the ductwork downstream of the Carbon Bed.

The primary filtration device for removal of radioactive particulates in the offgas stream is the High Efficiency Particulate Air (HEPA) filters, located upstream of the Carbon Bed. These are nuclear grade filters which are factory tested and certified to have a minimum particle capture efficiency of not less than 99.97 percent of 0.3 micron particles. All HEPA filters are further tested by DOE prior to installation at the site to certify 99.97% capture efficiency. Following installation, leak testing is performed across the filter bank to ensure adequate installation and filter performance. Three HEPA filter banks are located in series in the process, for triplex staged filtration of the offgas.

The Venturi Scrubber acts as a pre-filtration device to remove gross particulate from the offgas stream prior to entering the HEPA filters, thus substantially extending HEPA filter service life. The Venturi Scrubber removes 95-99 weight percent of particulates contained in the offgas flow through entrainment in a finely atomized liquid flow injected upstream of the venturi throat.

The current minimum gauge pressure drop specified by the manufacturer for new HEPA filters is 0.1 inches of water column (W.C.). When the pressure drop across an individual filter reaches 5 inches W.C., the filter is changed out. Pressure drop across the incinerator offgas HEPA filter bank is continuously monitored and recorded electronically and is alarmed in the event of a low or excess pressure drop indication. In the event of a low HEPA pressure drop alarm,

waste feed is automatically interrupted. In the event of a high pressure drop alarm (an indication of loading of the filter with moisture or particulate) operations personnel reroute offgas flow to the parallel back-up HEPA filter bank. This allows changeout of exhausted filters without interruption of operations.

HEPA filters in current usage at the CAI are the industry standard, non-regenerable type. Regenerable HEPA filters are available, but as yet are not approved for nuclear service. HEPAs removed from service are assayed to determine whether they contain transuranic (TRU) or low level radioactive contamination. Low level contaminated filters are placed into contained storage pending disposal at a mixed waste disposal site. TRU contaminated filters are placed into contained storage pending certification and disposal at WIPP.

P.O. Box 2262
Taos, New Mexico 87571-2262
5/29/89

NMEID
Mr. C. Kelley Crossman
Supervisor
Hazardous Waste Bureau
1190 St. Francis Drive
Santa Fe, NM 87503

RECEIVED

MAY 31 1989

Dear Mr. Crossman,

Operator: UNIVERSITY OF CALIFORNIA REGENTS
LANL TA-50 UNIT
CONTROLLED AIR RADIOACTIVE WASTES INCINERATOR
RCRA OPERATING PERMIT #NM0890010515-1
May 1989
Public Comment

HAZARDOUS WASTE SECTION

The following comments are requested for response in writing from U.S. EPA/
NM EID and from LANL staff at the public hearing June 13, 1989 in Santa
Fe.

Page numbers are referenced to the draft permit document:

(1)

page -35. HEPA Filters. It is my understanding that a carbon bed filter will remove radioactive elements, including Pu-238, Pu-239, Pu-240, tritium, etc. in the flue gas stream. What is the minimum gauge pressure drop across the carbon bed filter specified by the manufacturer. What is the frequency of verification of the pressure drop? Is it each shift?

When the carbon bed filter becomes plugged with radioactive pu or contaminated particulates how is the carbon bed filter regenerated? Is it purged with inert gas?

What is the specified frequency for carbon bed regeneration purging?

How frequently are the carbon bed absorber nozzles removed and inspected?

What is the disposal method for radioactive fly ash from the carbon bed filter purging?

(2) page A-9 Radioactive Scrubber Water

What happens to the radioactive scrubber water? It says the scrubber water "will always be within the discharge guidelines established under the NPDES permit for the Ta-50 radioactive treatment system thereby negating chemical analysis!" Does this mean that LANL will obtain a RCRA "delisting" from U.S. EPA for the scrubber wastewater?

LANL TA-50 Unit Radioactive Wastes Incinerator
RCRA NM #08900010515-1 (cont.)

Is there in effect a memorandum of prior understanding, pre-dating the draft permit between LANL and U.S. EPA for a RCRA "delisting" for the scrubber radioactive wastewater?

What is the maintenance checklist for the scrubber each shift, monthly and annually?

(3) ref: Permit Attachment K, NM EIB-HWMR-5, #301
and 40 CFR, Ch. I, part 262.42 (7)

40 CFR Part 262 is incorporated as Part III of the NM Hazardous Waste Regulations. 40 CFR, part 262.42 ,(6,7)requires(6) "a description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated. (7) "a description of the changes in the volume and toxicity waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984."

Is this waste reduction report to U.S. EPA available for public examination?

For example, what types of biodegradeable solvent replacements is LANL now using as replacements for chlorinated halogenated solvents and for chlorofluorocarbon solvents? What reduction in chlorinated solvents volume has been achieved by the use of biodegradeable solvent replacements?

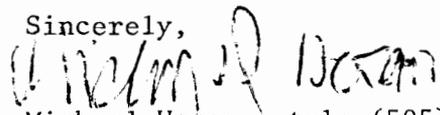
What is the volume reduction achieved, for example, in heavy metals through use of ion exchange metal recovery systems?

What is the volume reduction in cyanide containing water by use of reverse osmosis systems?

I herein request to receive a copy of the waste reduction report to U.S. EPA required by 40 CFR, Ch. I, part 262.42 (6) & (7).

As LANL has recently refused to provide even one waste 55 gallon drum for use as staging containers for community recycling in Taos County and as Dr. Jim Kane at University of California, Berkeley, the U.C. liason between LANL and President Gardner's office, did not ever respond to the request for community recycling containers, what precisely is the U.C. and LANL response to 40 CFR, Ch. I, part 262.42 (6) and (7).? If LANL is unwilling to donate several waste drums to Taos County for community recycling, their response to 40 CFR, Ch. I part 262.42 shall indeed be interesting at the public hearing on June 13, 1989.

Sincerely,



Michael Horan tel: (505) 758-3522
Taos, NM

cc: Mr. Bill Honker, U.S. EPA
RCRA Permits Branch, Dallas

P.O. Box 2262
Taos, New Mexico 87571-2262
5/29/89

NMEID
Mr. C. Kelley Crossman
Supervisor
Hazardous Waste Bureau
1190 St. Francis Drive
Santa Fe, NM 87503

RECEIVED

MAY 31 1989

Dear Mr. Crossman,

Operator: UNIVERSITY OF CALIFORNIA REGENTS
LANL TA-50 UNIT
CONTROLLED AIR RADIOACTIVE WASTES INCINERATOR
RCRA OPERATING PERMIT #NM0890010515-1
May 1989
Public Comment

HAZARDOUS WASTE SECTION

The following comments are requested for response in writing from U.S. EPA/
NM EID and from LANL staff at the public hearing June 13, 1989 in Santa
Fe.

Page numbers are referenced to the draft permit document:

(1)

page -35. HEPA Filters. It is my understanding that a carbon bed filter will remove radioactive elements, including Pu-238, Pu-239, Pu-240, tritium, etc. in the flue gas stream. What is the minimum gauge pressure drop across the carbon bed filter specified by the manufacturer. What is the frequency of verification of the pressure drop? Is it each shift?

When the carbon bed filter becomes plugged with radioactive pu or contaminated particulates how is the carbon bed filter regenerated? Is it purged with inert gas?

What is the specified frequency for carbon bed regeneration purging?

How frequently are the carbon bed absorber nozzles removed and inspected?

What is the disposal method for radioactive fly ash from the carbon bed filter purging?

(2) page A-9 Radioactive Scrubber Water

What happens to the radioactive scrubber water? It says the scrubber water "will always be within the discharge guidelines established under the NPDES permit for the Ta-50 radioactive treatment system thereby negating chemical analysis!" Does this mean that LANL will obtain a RCRA "delisting" from U.S. EPA for the scrubber wastewater?

LANL TA-50 Unit Radioactive Wastes Incinerator
RCRA NM #08900010515-1 (cont.)

Is there in effect a memorandum of prior understanding, pre-dating the draft permit between LANL and U.S. EPA for a RCRA "delisting" for the scrubber radioactive wastewater?

What is the maintenance checklist for the scrubber each shift, monthly and annually?

(3)

ref: Permit Attachment K, NM EIB-HWMMR-5, #301
and 40 CFR, Ch. I, part 262.42 (7)

40 CFR Part 262 is incorporated as Part III of the NM Hazardous Waste Regulations. 40 CFR, part 262.42 , (6,7) requires (6) "a description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated. (7) "a description of the changes in the volume and toxicity waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984."

Is this waste reduction report to U.S. EPA available for public examination?

For example, what types of biodegradable solvent replacements is LANL now using as replacements for chlorinated halogenated solvents and for chlorofluorocarbon solvents? What reduction in chlorinated solvents volume has been achieved by the use of biodegradable solvent replacements?

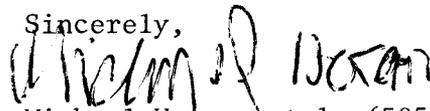
What is the volume reduction achieved, for example, in heavy metals through use of ion exchange metal recovery systems?

What is the volume reduction in cyanide containing water by use of reverse osmosis systems?

I herein request to receive a copy of the waste reduction report to U.S. EPA required by 40 CFR, Ch. I, part 262.42 (6) & (7).

As LANL has recently refused to provide even one waste 55 gallon drum for use as staging containers for community recycling in Taos County and as Dr. Jim Kane at University of California, Berkeley, the U.C. liason between LANL and President Gardner's office, did not ever respond to the request for community recycling containers, what precisely is the U.C. and LANL response to 40 CFR, Ch. I, part 262.42 (6) and (7).? If LANL is unwilling to donate several waste drums to Taos County for community recycling, their response to 40 CFR, Ch. I part 262.42 shall indeed be interesting at the public hearing on June 13, 1989.

cc: Mr. Bill Honker, U.S. EPA
RCRA Permits Branch, Dallas

Sincerely,

Michael Horan tel: (505) 758-3522
Taos, NM



HED NEWS

OFFICE OF PUBLIC INFORMATION
1190 St. Francis Drive
Santa Fe, New Mexico 87503
(505)827-2618

FOR IMMEDIATE RELEASE
MAY 19, 1989

CONTACT: C. Kelley Crossman
827-2923

SANTA FE, NM-- The Environmental Improvement Division of the New Mexico Health and Environment Department is seeking public comment on a draft hazardous waste permit for Los Alamos National Laboratory (LANL).

The draft permit details the requirements for storage and treatment of hazardous wastes generated through LANL operations. The public may review the draft plan at the Harold Runnels Building library, 1190 St. Francis Drive in Santa Fe, or the Espanola Public Library, 314A Oate, NW.

According to C. Kelley Crossman of EID's Hazardous Waste Bureau, LANL generates large quantities of waste solvents and chemicals which must be handled in accordance with strict guidelines. The draft permit specifies which chemicals may be stored while awaiting treatment, the treatment processes LANL may employ, and the conditions under which certain materials may be incinerated. Additionally, the permit will require LANL to investigate all past disposal sites and prepare clean-up plans where necessary.

Crossman said this permit does not authorize or address radioactive wastes contaminated with regulated chemicals, which are subject to a separate permit to be processed at a later date.

The public is also invited to attend a public hearing on the draft permit scheduled for June 13, 1989. The hearing will begin at 9:00 AM in the P.E.R.A. Building's Apodaca Hall, located in Santa Fe at the intersection of Paseo de Peralta and Old Santa Fe Trail.

(more)

Questions and comments regarding the draft permit may be directed to the Hazardous Waste Bureau, 1190 St. Francis Drive, Santa Fe, NM 87503. Comments must be received by July 7, 1989.