

MICHAEL HORAN

P.O. Box 2262

Taos, New Mexico 87571-2262

23 June, 1989

NM EID
C. Kelley Crossman
Supervisor
Hazardous Wastes Bureau
1190 St. Francis Drive
Santa Fe, NM 87503

RECEIVED

JUN 28 1989

Dear Mr. Crossman,

LANL TA-50 Unit
CONTROLLED AIR RADIOACTIVE WASTES INCINERATOR
RCRA OPERATING PERMIT #NM0890010515-1
May 1989
Public Comment

HAZARDOUS WASTE SECTION

Further to my comment letter dated 5/29/89, would you please incorporate the enclosed FOIA request to U.S. EPA as additional technical comments for response by U.S. EPA and LANL at the July 18, 1989 public hearing in Santa Fe.

I will attend the July 18, 1989 hearing in Santa Fe.

CLEAN AIR - A NEW MEXICO HERITAGE. LET'S PRESERVE IT! *

* motto of NM EID Air Quality Bureau

Sincerely,
Respectfully,



Michael Horan
tel: 758-3522
Taos, NM



8420

TC

P.O. Box 2262
Taos, New Mexico 87571-2262
23/6/89

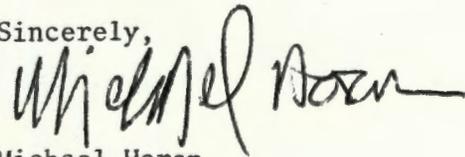
FOIA OFFICER
U.S. EPA
1445 Ross Ave.
Dallas, TX. 75202-2733

FOIA REQUEST
LOS ALAMOS NATIONAL SCIENTIFIC LABORATORY
LANL TA-50 UNIT
CONTROLLED AIR RADIOACTIVE WASTES INCINERATOR
RCRA OPERATING PERMIT #NM 0890010515-1

Persuant to FOIA and persuant to instructions of your Mr. Reeves of U.S. EPA Environmental Services Div. on 23 June, 1989 and preparatory to the public hearing of NM EID on July 18, 1989 on the above referenced draft permit, this is to request the U.S. EPA response to the following questions:

- (1) On the LANL TA-50 unit CAI, what was the historical U.S. EPA frequency of inspection of the pressure drop across the carbon bed filter. Was the pressure drop logged and compared to the manufacturer's specified minimum pressure drop?
- (2) When the pressure drop across the carbon bed filter was below manufacturer's minimum pressure drop specification, was the carbon bed filter purged with inert gas and was this purging filter regeneration ever witnessed by U.S. EPA and the pressure drop across the filter checked and logged after purging?
- (3) What was the frequency of carbon bed filter purging according to U.S. EPA CAI log inspections?
- (4) How frequently were the carbon bed filter nozzles removed and inspected in the presence of U.S. EPA inspectors?
- (5) Has, or will U.S. DOE/LANL obtain a RCRA "delisting" for the carbon bed filter fly ash and for the radioactive scrubber water from the TA-50 CAI?
- (6) Was the radioactive scrubber water ever tested by U.S. EPA?
- (7) 40 CFR Part 262.42 (6,7) requires a "Waste Minimization" report by U.S. DOE/LANL to U.S. EPA. Is U.S. EPA allowed to determine the U.S. DOE/LANL "Waste Minimization" as inadequate? If reviewed and determined as inadequate, is U.S. EPA allowed to deny the permit to operate?

Sincerely,



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

cc: Bill Honker, U.S. EPA, Dallas
C. Kelley Crossman, NM EID, Haz. Wastes Bureau, Santa Fe, NM