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28 June, 1989

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JUN 30 1989

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

HAZARDOUS WASTE SECTION

My comment is that it is impossible for the public to correctly evaluate or make substantive comments on the draft permit as EID has not provided (nor do you or EPA have yourselves) the most recent Environmental Assessment (EA) specific to the CAI.

It is my understanding from James Phoenix at DOE Area Office, Los Alamos that the most recent DOE EA specific to the CAI is undergoing correction within DOE and has not been provided to either U.S. EPA or to NM EID.

I therefore request that the July 18, 1989 public hearing be re-scheduled until such time as the most recent EA has been provided to EID, EPA and is available for public study.

Apart from the lack of the current EA, my concerns once again are:

- (1) No maintenance requirements for the pollution controls in the Draft Operating Permit
- (2) Are U.S. EPA inspection records of the carbon bed filtration available to the public?
- (3) May U.S. EPA deny the permit (or NM EID) based on inadequacy of Waste Minimization efforts at DOE/LANL? (See 40 CFR, Part 262.42 (6,7))
- (4) No perspective provided by DOE/EPA/NM EID on the total radioactive releases from all of these incinerators at the various labs (Lawrence Livermore, PANTEX, Rocky Flats, Savannah River, Ohio, etc.) Are the total releases equal to a large atmospheric test?
- (5) What happens to the radioactive scrubber water and filter fly ash?

Yours sincerely,

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cc: Bill Honker, U.S. EPA, Dallas

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