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SUMMARY COMMENTS
LANL TA-50 AREA CONTROLLED AIR TRU WASTES
INCINERATOR
EPA I.D. #0890010515

This will summarize my comments to date on the LANL TA-50 area controlled air Tru Wastes incinerator. Also enclosed are two technical exhibits and a letter from U.C. Berkeley for inclusion in the formal hearing record:

PARTICULATE EMISSIONS

From the DRE test burn, the LANL particulate emissions, corrected to 7% O₂ were: 0.0110, 0.0066, 0.0103, 0.0137, 0.0114, and 0.0153-gr/dscf.

These exceed the State of California sub-micron PM_{2.5} particulates limit of 0.008 gr/dscf @ 12 % CO₂ dry gas for MWCs. However, please note carefully that Sweden uses the same emissions limits for MWCs as for hazardous waste incinerators.

The LANL particulate emissions also exceed emissions limits on current world wide BACT and LAER for hazardous waste incinerators. At Bayer, Leverkusen, FRG, particulate emissions are 10-15 mg/m³ or 0.004-0.006 gr/dscf. Please see as evidence enclosed letter dated June 21, 1989 from Dr. Richard Denison, Environmental Defense Fund to Bob Holloway, OSW, U.S. EPA, Washington, D.C.

Please note also the new German developmental limit for particulates of 10 mg/m³ or 0.004 gr/dscf.

Thanks to Shiva Garg, Dwight Hlustick and Sonja Stellmack at U.S. EPA, OSW, Wash., D.C. for providing this evidence.



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MAINTENANCE REQUIREMENTS

Operating permit should include the CH₂M Hill recommended maintenance inspection procedures and schedule, or the U.S. EPA recommended inspections in their March 1989, U.S. EPA Emissions Guidances for HCl and

LANL TA-50 Controlled Air
Tru Wastes Incinerator (cont.)

Heavy Metals.

According to Rich Mayer of U.S. EPA, Dallas, EPA never actually inspected the incinerator when it was operating, except during the start-up controlled test burn. They never checked the pressure drop across the filters to see if the filters were operating correctly. This is important as the filters may have been blinded, plugged or blown out.

Suggest chart recording for the pressure filter drop as an indicator of when they need replacement/purging.

WASTE MINIMIZATION

LANL has not provided statement of efforts to reduce volume and toxicity of the wastes pursuant to 40 CFR. This includes materials substitutes.

ENVIRONMENTAL ASSESSMENT

EA, quantifying the emissions characteristics and describing alternative control strategies such as waste minimization and recycling not provided by DOE. Please see enclosed letter of response from U.C. Berkeley, Laboratory Affairs.

PCDDs and PCDFs Dioxins

A stack sample has never been done for PCDDs and PCDFs on the incinerator. So, will LANL meet the proposed State of New Mexico limit of 0.1 ng/m^3 @ 7% O_2 which parallels the Swedish [REDACTED] dioxins limits. Please see as evidence enclosed letter from Dr. Denison, EDF to U.S. EPA.

Exhibit, SWEDEN SAKAB HAZARDOUS WASTES INCINERATOR PAPER

Please enter as exhibit enclosed interesting paper presented at New Jersey Institute of Technology, Oct. 26, 1988 on the Swedish SAKAB hazardous wastes incinerator

LANL TA-50 Controlled Air
TRU Wastes Incinerator (cont.)

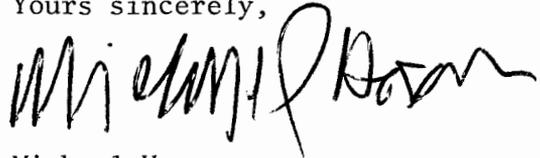
Many thanks to Shiva Garg at U.S. EPA, OSW, Wash., D.C. tel: (202) 382-7924 and to Dwight Hlustick at U.S. EPA, OSW for providing the SAKAB paper. I have also hand delivered it to DOE at Los Alamos for Ralph Koenig, Waste Management section, LANL.

Please note carefully the interesting hazardous waste controlled landfill construction detail in the SAKAB paper.

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

*
motto of NM EID Air Quality Bureau

Yours sincerely,



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Encls: (1) exhibit letter of Environmental Defense Fund to U.S. EPA
(2) exhibit paper on the Swedish SAKAB hazardous wastes incinerator
(3) exhibit, letter from U.C. Berkeley, Office of Laboratory Affairs
re the EA.

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

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