712 Calle Grillo
Santa Fe, NM 87501
August 24, 1989

Richard Mitzelfelt, Director
Environmental Improvement Division
1190 St. Francis Drive
Santa Fe, NM 87501

Re: Los Alamos National Laboratory (LANL)
Permit to Burn Radioactive and Hazardous Materials

Dear Mr. Mitzelfelt:

The main question I have with regard to LANL's application to burn radioactive and hazardous materials in the existing incincerator is: If LANL is a world class laboratory, why are they not required to meet world class emission standards on the stack such as those regulations adopted in Sweden? The Swedish emission standards include dioxins, furans, mercury, cadium, etc. The 1971 Clean Air Act standards talk about particulate emissions, whereas the Swedish government standards are nine times stricter than U.S. standards! The U.S. has no dioxin limit at all. Dioxins are one of the most toxic substances known to man. While dioxins may be destroyed in the incineration process, they are reformed while leaving the stack!! We must adopt standards equal to or stronger than the Swedish standards.

Other questions and comments which I have are addressed below:

1. What happened to the ash which was produced by previous years of burning in the incinerator? Can we obtain copies of the previous buring records, emissions reports and HEPA filter reports.

2. What type of program does LANL have for recyclying, waste minimization and source reduction of waste at this time and what plans will be included in the permit process? How will these plans

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for alternatives to incineration be monitored? I understand that LANL has not done much work in this area and should be required to do so.

3. I also understand that there has been no stack sample for heavy metals done on this incinerator. Please make sure one is done before any type of approval of this permit is allowed.

4. Ambient measurements for stack samples are conjecture. Monitoring on the stack is imperative.

5. If radioactive waste is deregulated as "below regulatory concern" by the Nuclear Regulatory Commission, how will this affect the incinerator process and the resulting ash?

6. How are radionuclides destroyed by fire?

7. How will the Environmental Improvement Division monitor the incinerator? How can we trust LANL to monitor itself in light of the Department of Energy's (DOE) track record of non-compliance, self-regulation and cloak of "national security"?

8. Is waste from other DOE facilities scheduled to be burned in this incinerator? I understand LANL stores waste from Sandia National Laboratory. Is this waste commingled? Who monitors these shipments?

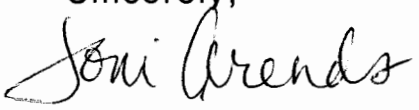
9. I believe that the hearing process should remain open until 60 days after the release to the public of LANL's Environmental Assessment Report. This document is referred to in the permit application, but has not been released yet!! How can the public accurately comment on this permit application to burn radioactive and hazardous materials? What is the reality of this situation? It does not look or feel good at all. It appears and feels as if there is deception of the public faith.

10. What is the worst case senario on the incinerator and has relative risk been included in the calculations? Has the half-life of plutonium been included in these calculations - 240,000 years?

11. Please make sure the half-life of plutonium - 240,000 years - is included in all calculations related to the incinerator so that future generations are included in this process.

Thank you for your time.

Sincerely,



Joni Arends