



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI
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REPLY TO: 6T-AS

MEMORANDUM

SUBJECT: Controlled Air Incinerator at Los Alamos National Laboratory

FROM: Gerald W. Fontenot
Chief
Air Programs Branch (6T-A)

TO: William J. Gallagher
Chief
Superfund Programs Branch (6H-P)

We have completed our review of the package of informational material on the subject incinerator, submitted to EPA in connection with RCRA permitting activities (letter from C.L. Warner to R.D. Mayer, Jr., August 23, 1989.) We have the following comments:

1. On p.1, #1, para. 1 it is stated that solid TRU waste is contaminated with transuranics at a level greater than 100 nanocuries/gm, and that such wastes will be accepted for incineration. However, the NESHAPs application for this incinerator, submitted to EPA on November 1, 1988, states on p. 4 that wastes having activity higher than 100 nanocuries/gm will be separated and handled as transuranic wastes (i.e., will not be incinerated). This situation is made even more uncertain by the wording on p. 1, para 2 of Appendix C, where the acceptance criterion is given as 5,000 nanocuries/gm or less of "radioactive materials", without specifying what the TRU fraction might be.
2. In Section 5.4 of Appendix B the feed interruption and cutoff interlocks and shutdown control system are described, and we assume that controlled and fast shutdown involve certain automatic protective functions, since system damage and release of the radioactive inventory can result if the operator ignores the warning signals. However, nowhere in Section 5.4 could we find any reference to automatic setbacks, shutdowns or scrams. We question the safety of any safety system for such an operation which relies solely on positive action by a human operator to avoid or terminate an accident.
3. On p. 5 of Appendix C the release rate is supposedly calculated for design feed rate of 434 lb/hr but seems to have been done instead for 100 lb/hr feed rate. This results in an error of factor 4.34 in the non-conservative direction.

cc: Rich Mayer (6H-PS)



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