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(505) 758-3522

24/11/89

OS-50
Jack Ellvinger
Chief, Hazardous Waste Bureau
NM EID
1190 St. Francis Drive
P.O. Box 968
Santa Fe, NM 87504-0968

Dear Sir,

PARTICULATES RE-TEST
LANL TA-50 CAI
RCRA Permit, Nov. 8, 1989

On 16/11/89 I toured the LANL TA-50 CAI with David Hutchins of the LANL HSE-7 group and with George Van Tiem of LANL.

This is to draw to your attention that the RCRA TRIAL BURN Particulate Matter (PM) test results in 1986 exceed the proposed NM EID AQCR 2000 PM limit of 0.008 gr/dscf @ 12% CO₂ and exceed the Swedish PM limit for hazardous waste incinerators. The Swedish limit is nearly identical to the Calif. and proposed NM limit except for the CO₂ correction. Specifically:

LANL TA-50 CAI RCRA Trial Burn (1986) PM (gr/dscf @ 7% O ₂)	max	0.0244	gr/dscf @ 7% O ₂
State of California PM ₂ limit 0.008 gr/dscf @ 12% CO ₂		0.008	gr/dscf (CA limit)
NM EID AQCR 2000 PM ₂ limit 0.008 gr/dscf @ 12% CO ₂		0.008	gr/dscf (NM limit)
Sweden total particulates limit 0.008 gr/dscf @ 10% CO ₂		0.008	gr/dscf @ 10% CO ₂ Sweden limit

As you see, the LANL TA-50 CAI exceeds the Swedish, California and New Mexico limits by 3X.



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LANL TA50 CAI
Particulates Re-test (cont.)

The RCRA Permit Module V.I.5.b requires that the DRE be re-verified if modifications are made to the incinerator.

The entire offgas piping system has been changed from glass fiber to Hastelloy C.

My question therefore is:

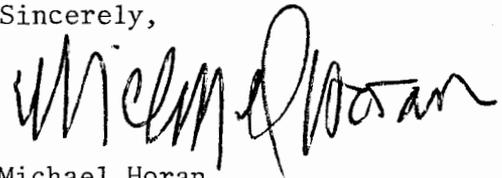
As extensive changes have been made to the incinerator in the rehab work, may NM EID + U.S. EPA ask LANL to re-test for particulates in addition to the DRE re-test?

And may NM EID ask LANL to demonstrate particulates emissions lower than the AQCR 2000, CA. + Swedish limits?

My understanding from David Hutchins (HSE-7 group, LANL) is that he is confident the CAI will test below the NM EID, CA. and Swedish particulates limits.

Please discuss this with Bill Gallagher in the RCRA Permits Section, U.S. EPA, Dallas and advise your decision.

Sincerely,



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

cc: Bill Blankenship, NM EID Air Quality Bureau

Bill Gallagher, RCRA Permits Section, U.S. EPA, Region VI, Dallas