



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

MAR 10 1993

Ask Jim Sales RCRA permits
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Barbara
Stephanie

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Mr. Jerry L. Bellows
Area Manager
Department of Energy
Field Office, Albuquerque
Los Alamos Area Office
Los Alamos, New Mexico 87544

Dear Mr. Bellows:

We are in receipt of your letter of February 16, 1993, concerning the Polychlorinated Biphenyl (PCB) approval for the Los Alamos National Laboratory (LANL) Controlled Air Incinerator (CAI) approval.

We have considered your requests for modification in the language of the approval conditions, and our responses to your concerns are as follows:

I. Modifications Requested

A. Conditions II.B. and IV.O.

You noted that the CAI is undergoing extensive modifications to improve operational control, and that these modifications will not result in increased emissions. The RCRA Part B included most, but not all, of the completed and planned modifications, and none of the modifications contemplated will increase the capacity or affect the CAI's destruction efficiency.

Approval condition II.B. has been modified to require LANL to notify EPA should any change be made that could increase emissions from the CAI, and condition IV.O. has been changed by substituting the word "increase" for the word "alter".

I. B. Condition II.C.

Condition II.C. has been changed to eliminate the reference to solid PCBs. Only liquid PCBs generated by DOE is approved for the CAI.



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I.C. Condition III.B.12.

This condition has been modified to reflect that PCB disposal is only one part of the CAI Operating Manual by including the language suggested in your letter.

I.D. Condition IV.H.

This condition has been modified to make clear that it is acceptable to keep all of the required operation records in the CAI building, and that it does not mean that the information has to be kept in the control room.

I.E. Condition IV.M.

This condition has been modified to provide for the Emergency Management Office (EMO) as the source of a duty officer to direct emergency procedures which may be necessary at the CAI.

II. Clarifications Requested

A. Condition III. C.2.

The citation of 40 CFR 761.90 was an error, and has been eliminated from the approval conditions.

B. Condition IV.B.

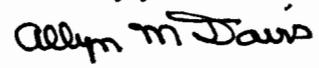
We will be glad to discuss any problems with complying with RCRA and TSCA incineration requirements during PCB disposal. On the RCRA permitted wastes, neither EPA nor the State of New Mexico defines PCBs as a hazardous waste. Burning PCBs under the TSCA approval would not, therefore, violate the RCRA permit restrictions on waste feed.

III. EPA Requested Information

We are in receipt of the information required by your PCB approval under conditions III.B.4., III.C., and IV.M.

If you have additional questions or comments, please contact me.

Sincerely yours,

A handwritten signature in black ink that reads "Allyn M. Davis". The signature is written in a cursive style with a prominent "A" and "D".

Allyn M. Davis
Director
Hazardous Waste Management Division

Enclosure

cc: Kathleen Sisneros, NMED