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**ENVIRONMENT DEPARTMENT**  
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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

May 12, 1995

Mr. Larry Kirkman  
Department of Energy  
Los Alamos Area Office  
528 35th Street  
Los Alamos, NM 87544

Dear Mr. Kirkman:

**RE: Class 2 RCRA Permit Modification Approval, Controlled Air  
Incinerator  
EPA ID No. NM 0890010515-1**

The New Mexico Environment Department (NMED) hereby approves the Class 2 permit modification to permit conditions affecting the Controlled Air Incinerator (CAI) destruction and removal efficiency (DRE) requirements. The approved permit modification is incorporated in the following three enclosures:

Enclosure 1 lists the modifications made to the LANL Hazardous Waste Permit, indicating the location of modifications within the permit and a brief description of the modifications.

Enclosure 2 is the redline/strikeout version of the permit pages to help the reader rapidly identify the modification. Language deleted from the permit is ~~highlighted and stricken out~~. Language added to the permit is ~~highlighted only~~.

Enclosure 3 is the clean copy page to be inserted into the permit.

LANL is requested to place Enclosure 1 in the front of the permit to provide a historical record of modifications to the permit. The effective date of the permit modification approval is your date of receipt of this letter.

The Hazardous and Radioactive Materials Bureau (HRMB) released the proposed permit modification and associated documents for a sixty (60) day public comment period which ran from February 10 through April 11, 1995. HRMB received no written comments during the public comment period.



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Mr. Larry Kirkman  
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If you have any questions, please contact Steve Zappe of my staff  
at (505) 827-4308.

Sincerely,



Ed Kelley, Ph.D.  
Director, Water and Waste Management Division

Enclosures

cc: David Neleigh, EPA Region 6  
Benito Garcia, HRMB  
Barbara Hoditschek, HRMB  
Steve Zappe, HRMB  
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LIST OF CLASS II MODIFICATIONS MADE  
to the Los Alamos National Laboratory  
Hazardous Waste Permit

Effective: May 12, 1995

Following is a list of Class II modifications made to the Los Alamos National Laboratory Hazardous Waste Permit during May 1995 by the Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED). In the permit, modifications are indicated by ~~striking out and shading items to be deleted~~ and shading items to be added. This list will help the reader rapidly identify the current modifications and when they were made.

Module	Page (s)	Section	Paragraph/Line	Description of Modification
V	9	V.H.5		<b>Add:</b> Section describing conditions when destruction and removal efficiency (DRE) must be verified. Replace the phrase "five years after the effective date of this permit" with "three years after the commencement of hazardous waste incineration".
V	10	V.I.5.b		<b>Delete:</b> Section describing conditions when DRE must be verified.
V	10	V.I.5.c		<b>Change:</b> Paragraph label from "c." to "b."

the HEPA filters and the carbon absorber materials. The carbon absorber unit materials shall be replaced at intervals no longer than 2000 operating hours.

#### V.H. INSPECTION

The Permittee shall inspect the incinerator in accordance with Permit Attachment B. and the requirements below.

1. Spill Kits. The type, presence, location and quantity of spill kits shall be verified and annotated monthly. If spill kits are locked up, the location of access keys shall be verified.
2. Instrumentation. All gauges and instruments shall be inspected for calibration dates prior to incineration of wastes. No instrument or gauge shall be used if it has not been calibrated in accordance with its manufacturers, recommendations.
3. Warning Signs. The legibility and condition of warning signs shall be included in the quarterly inspection. Missing or illegible signs shall be promptly replaced within 24 hours of discovery.
  - a. Signs shall be at the entrances to the hazardous waste units. Collocated units may be included within one signed area.
  - b. Signs shall say "Danger, Unauthorized Personnel Keep Out" and "Hazardous Waste Storage Area".
  - c. Signs shall be in English and Spanish.
  - d. Signs on approachable fences shall be spaced no more than 50 feet apart.
4. Automatic Cutoff. The automatic cutoff system shall be tested every 2000 operating hours to demonstrate proper operation.
5. Destruction and Removal Efficiency. The destruction and removal efficiency (DRE) shall be verified after incinerator modifications affecting the DRE, upon accumulation of eight thousand hours of hazardous waste incineration time or three years after the commencement of hazardous waste incineration (whichever occurs

first), or if NMED determines that new information requires further testing of the incinerator. The time calculation shall be restarted following any verification required by this paragraph.

## V.I RECORDKEEPING

1. Waste History. The incinerator operating record shall include the source, date of receipt, description, quantity and rate of incineration for each batch of hazardous waste incinerated.
2. Waste Analysis. Records of waste analysis shall be kept in accordance with permit paragraph II.K.1.a. above.
3. Inspections. Records of inspection shall be kept for three years from the date of the last action taken as a result of the inspection.
4. Automatic Waste Feed Cutoff. Whenever the automatic waste feed cutoff system required by permit paragraph V.F.8. above operates, the cause, time and remedy or repair shall be entered in the operating record. This record shall include the testing or demonstration operations required by permit paragraph V.H.4. above.
5. Effluent Analysis.
  - a. Whenever sampling and analysis of the incinerator combustion exhaust or effluent control system scrubber solution are done, the sampling date, individual(s), methods and analytical results shall be entered in the operating record.

~~b. The destruction and removal efficiency (DRE) shall be reverified after incinerator modifications affecting the DRE, upon accumulation of eight thousand hours of hazardous waste incineration time or five years after the effective date of this permit, whichever occurs first or if NMED determines that new information requires further testing of the incinerator. Subsequent to a modification subject to this paragraph the time calculation shall be restarted.~~

- eb. Results of calculations of the DRE associated with effluent analysis shall be entered in the operating record.

#### V.J. CLOSURE

The incinerator shall be closed in accordance with HWMR-5, as amended 1989, Part V, Subpart G and Part V, 40 CFR section 264.351, permit paragraphs II.L. and V.J. and Permit Attachment E.

1. Incinerator Components. The waste feed components and combustion chambers, along with interconnecting plumbing, may be steam cleaned with a detergent solution. The spent cleaning solution shall be collected and analyzed for hazardous constituents. If no hazardous constituents are detected, those components may be considered closed. If hazardous constituents are detected, the steam cleaning may be repeated until no detectable hazardous constituents are found.
2. Effluent Control System. The ECS may be drained and flushed with a detergent solution. The spent cleaning solution shall be collected and analyzed for hazardous constituents. If no hazardous constituents are detected, those components may be considered closed. If hazardous constituents are detected, the cleaning may be repeated until no detectable hazardous constituents are found.
3. Waste Storage Tanks. The waste storage tanks may be either drained and washed with a detergent solution or steam cleaned. The spent cleaning solution shall be collected and analyzed for hazardous constituents. If no hazardous constituents are detected, those components may be considered closed. If hazardous constituents are detected, the cleaning may be repeated until no detectable hazardous constituents are found.
4. Closure Residues.
  - a. All final cleaning solutions used for closure shall be tested for POHCs designated in permit paragraph V.D. above. Solutions showing detectible POHC(s) or hazardous waste characteristics shall be disposed of as hazardous wastes.

- b. Any component not decontaminated in accordance with permit paragraph V.J. above shall be disposed of as hazardous waste.