



Department of Energy
Field Office, Albuquerque
Los Alamos Area Office
Los Alamos, New Mexico 87544

SEP - 2 1994



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Stephanie Kruse
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
525 Camino de los Marquez
Santa Fe, NM 87502

Dear Ms. Kruse:

This letter is in regard to Clarification of Language - State Permit
No. NM5890110518-EP1.

The Los Alamos National Laboratory (LANL) began operating a thermal decomposition unit for treating plutonium-impregnated nitrated cheesecloth on July 7, 1994, pursuant to an emergency permit approved by the New Mexico Environment Department on May 26, 1994. Subsequent to permit issuance and initiation of operation, LANL has found two statements in the issued permit that require clarification.

1. On page 4, paragraph 2 of permit Attachment A, a sentence which reads "The furnace can will not be loaded with more than 10 percent by weight of nitrated cheesecloth" should be changed to *10 percent by volume*. The operating parameters described in the procedure developed for operating the thermal decomposition unit and used in writing this permit allows for a feed rate of 10 percent by volume, not weight. This action will not change the operating conditions or efficiency of the thermal decomposition unit.
2. On page 6, paragraph 2 of permit Attachment A, the following is written: "Maintenance of the caustic scrubber will be performed when, based on the visual observation of the scrubber water by the IADU operator, the water appears darkened or discolored. Maintenance is expected after the completion of every 3 to 5 runs." The purpose of the caustic scrubber water is neutralization of chlorides and other halogens off-gassed from decomposition of plutonium-impregnated nitrated cheesecloth. The scrubber is effective as long as the water maintains a high pH (i.e., greater than 10.0). The color of the water is not relevant to the effectiveness of the scrubber unit. Newly introduced scrubber water becomes discolored immediately as a result of remaining residue in the scrubber unit. Scrubber water has been found to maintain a pH of 10.0 or better after every three to five cycles. Therefore, the following language is suggested: *Maintenance of the caustic scrubber water will be performed to maintain a pH above 10.0 ensuring the ability of the scrubber water to treat off-gassed halogens. Scrubber water will be changed every three to five cycles.*



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Stephanie Kruse

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If you have any questions, please contact Jon Mack of my staff at 665-5026;
or Juan Corpion, ESH-8, LANL, at 665-0455.

Sincerely,



Joseph C. Vozella
Acting Asst. Area Manager
Office of Environment and
Projects

LAAMEP:7JM-259

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