

AK RIDGE RESERVATION

Environmental Management

January 13, 1997

Mr. Rod Nelson
Assistant Manager for Environmental Management
DOE/ORO-EM
P.O. Box 2001
Oak Ridge, TN 37831


Dear Mr. Nelson:

At our January 8, 1997 meeting, the Oak Ridge Reservation Environmental Management Site Specific Advisory Board (ORREMSSAB) reviewed and approved the following recommendation for the TSCA Incinerator RCRA Permit Renewal Application:

The ORREMSSAB is concerned that the changes proposed in the RCRA Permit Renewal Application for the TSCA Incinerator do not reassure the public that the incinerator is operating in a manner that is protective of human health and the environment. The ORREMSSAB recommends that a public workshop be held prior to the issuance of the draft permit so that public concerns can be expressed and responded to in a meaningful way.

The ORREMSSAB appreciates the opportunity to comment on the TSCA Incinerator RCRA Permit Renewal Application.

Sincerely,



Randy Gordon, Chair
ORREMSSAB

RG/sb

cc: Jim Harless, TDEC SSAB Ex-Officio
Ed Carreras, USEPA Region IV SSAB Ex-Officio

**ORREMSSAB
ENVIRONMENTAL RESTORATION COMMITTEE
MEMORANDUM**

To: ER Committee Members cc: Sheree Black
From: Mary Bryan
Date: December 17, 1996
RE: TSCA Incinerator RCRA Permit Renewal Application

On December 12, I attended the "Pre-Application Meeting for the TSCA Incinerator". The RCRA permit for the TSCA incinerator is due for renewal and DOE is proposing changes in its operating conditions in its permit renewal application. A pre-application meeting was required because changes are being recommended to operating conditions. The deadline for comments on the application is January 10. Six to eighteen months after the application is received by the regulators, a draft RCRA permit will be issued and there will be opportunity for more formal comment before a final permit issued.

My concern is that a number of issues were brought up by the public about the safety of the TSCA incinerator that the proposed changes do not address. For instance, concern was expressed about the inadequacy of the ambient air monitoring system for the incinerator. Because ambient air monitoring was not being addressed by the proposed changes, the DOE representative was reluctant to entertain this comment. They only wanted comments on the changes they have proposed. My understanding is that many of the concerns that were raised have been raised for years by various groups and individuals and that the feeling is that DOE is not responding adequately to them. It was obvious that the meeting participants were not reassured that the proposed changes to the RCRA permit will address their concerns about the safety of the operation of the TSCA incinerator.

Therefore, I would like for the ORREMSSAB (via the ER Committee) to submit a simple, written comment on the TSCA incinerator permit renewal application. I suggest the following:

**Application for RCRA Permit Renewal for the
Toxic Substances Control Act Incinerator**

**Comment and Recommendation from the
Oak Ridge Reservation Environmental Management
Site Specific Advisory Board
January 8, 1997 (assuming this passes at the Board mtg.)**

The ORREMSSAB is concerned that the changes proposed in the RCRA permit renewal application for the TSCA incinerator do not reassure the public that the incinerator is operating safely. The ORREMSSAB recommends that a public workshop be held prior to the issuance of the draft permit so that public concerns can be expressed and formally responded to.

Information is due to Sheree by Dec. 19 for the Executive Committee meeting on Dec. 30. I apologize for the short notice, but I think that it is important and if we keep it simple it shouldn't be too hard to do. Please let me know if you can support this recommendation, would like to amend it, or cannot support it as soon as possible.