

Permit

John Parker / File



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October 17, 2000

Andrew R. Grainger
NEPA Compliance Officer
Evaluation and Performance Division
Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

RECEIVED

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DOE OVERSIGHT BUREAU

Dear Mr. Grainger:

RE: DRAFT ENVIRONMENTAL ASSESSMENT FOR THE OFFSITE TRANSPORTATION OF CERTAIN LOW-LEVEL AND MIXED RADIOACTIVE WASTE FROM THE SAVANNAH RIVER SITE FOR TREATMENT AND DISPOSAL AT COMMERCIAL AND GOVERNMENT FACILITIES (DOE/EA-1308)

This transmits New Mexico Environment Department (NMED) staff comments concerning the above-referenced Draft Environmental Assessment (DEA).

The transportation in New Mexico of Low-level radioactive waste (LLW) and mixed low-level radioactive waste (MLLW) falls under the jurisdiction of the State's Department of Public Safety. The DEA identifies transportation of LLW to Eunice, New Mexico, for treatment, storage and/or disposal at Waste Control Specialists (WCS). The NMED's Hazardous Waste Bureau is concerned that it does not have an application nor has it been officially contacted by representatives of WCS for a RCRA Treatment, Storage, or Disposal Permit. Any application for a LLW disposal permit would have to go through the Radiation Licensing Program in the Field Services Division. The RCRA Permit must be issued before construction begins.

Following are a number of observations related to air quality. The DEA does not provide sufficient information to determine the potential air quality impacts of the proposed action. The potential impacts from the spill of hazardous materials in mixed low-level waste are not addressed. The document uses the phrase "source term" without defining it. Also, it is unclear why SRS is unable to meet South Carolina requirements for disposal.

40 CFR Part 61, Subpart H is the National Emission Standards for Emissions of Radionuclides Other than Radon from Department of Energy Facilities. The DEA should address these standards and discuss how the proposed action would or would not comply with them. If a standard is not applicable to an action, the DEA should discuss why it is not and which

Regulatory



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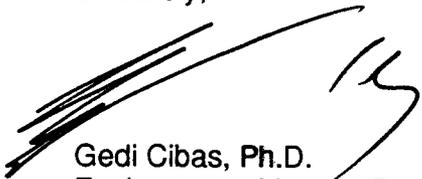
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standards may be applicable. The aforementioned applicable transportation related standards should be addressed and referenced in the DEA.

10 CFR 1021.301 and 40 CFR 1502.8 require that NEPA documents be written in plain language. The Department of Energy's *Environmental Assessment Checklist* (August 1994) includes this guidance. The DEA, however, is replete with technical terminology; the public would have a very difficult time understanding the environmental impacts of the proposal by reviewing this document. We strongly recommend that the language be clarified; it is unclear to us what the air quality impacts would be from the proposal.

We appreciate the opportunity to comment on this document. Please let us know if you have any questions on the above.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gedi Cibas', with a large, stylized flourish extending from the end of the name.

Gedi Cibas, Ph.D.
Environmental Impact Review Coordinator

NMED File No. 1402ER