

Permit

/o=State of New Mexico/ou=First Administrative Group/cn=Recipients/cn=John.Kieling

From: Joni Arends [jarends@nuclearactive.org]
Sent: Monday, April 03, 2006 2:30 PM
To: Kieling, John, NMENV
Subject: CCNS comments about Pubic Notice No. 06-02

Attachments: NMED CO 4.3.06



NMED CO 4.3.06
(42 KB)

April 3, 2006

By email to: john.kieling@state.nm.us

John E. Kieling, Program Manager
NMED Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Re: Public Notice No. 06-02, dated January 31, 2006
Public Comments about the Proposed Modification to the Los Alamos National Laboratory
Hazardous Waste Permit under the New Mexico Hazardous Waste Act
EPA ID No. NM0890010515

Dear Mr. Kieling:

Concerned Citizens for Nuclear Safety (CCNS) makes the following comments about the proposed modification to the changes to the Los Alamos National Laboratory (LANL) Hazardous Waste Permit under the New Mexico Hazardous Waste Act.

Generally, we support the proposed draft permit modification. We note that the Compliance Order is a legally enforceable document. Public Notice, p.

1. With new findings of chromium VI in the regional aquifer and PCBs in Rio Grande fish tissue, and LANL the likely source for both, we encourage and support strong enforcement of the Compliance Order requirements.

With respect to the draft permit modification, we appreciate the continued inclusion of the Community Relations Plan. Should it be numbered ³D.² and not ³E?² We request that an additional requirement be included in the Plan, which is that LANL must spell out its procedures for public access to documents. Specifically, the Plan should explain how a member of the public requests documents or accesses a database; whether there is a charge for documents; and how many copies of a specific document the public may request. If meetings are required to be held, the Plan should include how the public will be notified about the meetings.

For consistency, in Section E.2.g. the ³Administrative Authority² must be changed to ³Secretary.²

We suggest that the Table of Contents include the list of Required Plans.

Thank you for your consideration of our comments. Should you have any questions or comments, please contact me at the phone or email address below.

Sincerely,

Joni Arends, Executive Director
Concerned Citizens for Nuclear Safety



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