



## **EIGHT NORTHERN INDIAN PUEBLOS COUNCIL**

P.O. Box 969  
San Juan Pueblo, New Mexico 87566  
(505) 852-4265

**August 24, 1989**

**Mr. Walter Youngblood  
Public Health Division  
State of New Mexico  
Health and Environment Department  
1190 St. Francis Drive  
Santa Fe, New Mexico 87504**

**RECEIVED**

8/24/89 5:05 pm

**PUBLIC HEALTH DIVISION  
DIRECTOR'S OFFICE**

**Dear Mr. Youngblood:**

**On behalf of the Eight Northern Indian Pueblos Council, please find enclosed our DRAFT POSITION PAPER relative to the Los Alamos National Laboratory's application to continue handling hazardous waste.**

**Our Board of Governors will not meet until early September 1989 to formalize and act on the Position Paper, therefore, this document is subject to change and approval.**

**Should you have any questions, please do not hesitate to call me at 852-4265 for additional information.**

**Sincerely,**

*Bernie F. Teba*

**Bernie F. Teba, Executive Director  
EIGHT NORTHERN INDIAN PUEBLOS COUNCIL**

**Enclosure**



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**DRAFT POSITION PAPER OF THE  
EIGHT NORTHERN INDIAN PUEBLOS COUNCIL (ENIPC)  
ON THE  
APPLICATION BY THE  
LOS ALAMOS NATIONAL LABORATORY  
TO CONTINUE TO HANDLE HAZARDOUS WASTE**

**As the representatives for the Eight Indian Pueblos communities of Northern New Mexico and with centuries of respectful habitation in this land, we wish to express our concern about the Los Alamos National Laboratory's plan to begin regular incineration of "mid-level (TRU) radioactive and hazardous wastes.**

**Our forefather's settled in this region many centuries ago with the belief that the land and its resources would live in harmony and that we as the caretakers of this land would, heretofore, protect and preserve those resources. "Living in harmony" means to respecting Mother Earth and Nature and maintaining a balance between them and their children.**

**Today we face a different situation. In this age of "nuclear energy harness", it became obvious after a time, what are we to do with the waste and how can we "destroy" it without harming man or his environment. It apparently cannot be done safely even though attempts are made to do so.**

**In researching the issues relative to the Laboratory's application, we have identified some of the primary problems with their incinerator plan and would request a response from your office on the following:**

- \*\* Radioactive materials are not destroyed by fire. They are merely reduced in size, increasing their chance to escape through filter systems and to be ingested or inhaled. One of the radioactive elements, plutonium, we understand lasts**

**240,000 years and is deadly in microscopic quantities. We also understand that the emissions from the smokestack will not be monitored.**

- \*\* After incineration, a highly toxic and dangerous ash containing radionuclides, heavy metals, dioxins and PIC's will remain to be disposed of.**
- \*\* There is also a high probability of airborne releases of radioactive materials occurring through the smokestack. While the stacks will be equipped with filter systems to screen out particulate matter, no foolproof filtration system exists. Massive atmospheric releases of plutonium and other deadly radioactive elements in recent years at DOE's Rocky Flats Plant in Colorado have proven to be the rule, not the exception.**
- \*\* The filter's will be cleaned with water. This process pollutes the water and turns yet another precious resource into yet another waste. Thus, creating another problem.**
- \*\* The current regulations stipulate that outside authorities must be notified of airborne releases within 24 hours. With even a gentle wind blowing, released radiation would spread to the surrounding region in a matter of hours, not days. Can LANL guarantee that no human, animal or other physical resource would be exposed and die from its effect.**
- \*\* The primary standards that will regulate LANL's incineration process were drawn up by the Atomic Energy Commission in the late 1940's. They are dangerously out of date**

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**and not in line with present-day understanding of the dangers of low but sustained exposure to radiation and hazardous wastes.**

- \*\* DOE will essentially "self-regulate" and "self-monitor" the incinerator. As revealed around the nation over the last few years, DOE has a horrendous record in protecting the worker and public safety, and in meeting environmental standards.**
- \*\* Many commercial incinerators around the nation have been designated as "Superfund" sites--places of extreme environmental contamination selected by EPA for special clean-up projects. Communities surrounding such sites have markedly higher incidences of cancer, birth defects and other major illnesses.**

**The Eight Northern Indian Pueblos Council feel that many of these questions which we have addressed above have yet to be answered; additionally, because of the permanent long term effects of whatever is decided, we feel that questions we have posed should be answered to our satisfaction, perhaps with guarantees that we would suffer no ill effects. Until we are satisfied with the answers, the Governors of the Eight Northern Indian Pueblos hereby adamantly oppose the LANL application to incinerate anykind of radioactive or hazardous waste.**

**Therefore, we recommend that the State of New Mexico not approve LANL's application.**