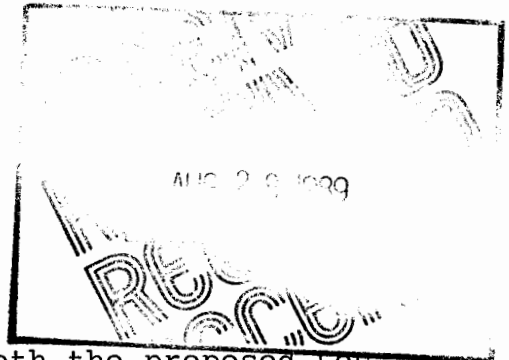


August 24, 1989

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Rad file



Mr. Kelly Crossman  
Environmental Improvement Division  
1190 St. Francis Drive  
Santa Fe, NM 87501

Dear Mr. Crossman,

The following is my opinion regarding both the proposed Los Alamos incinerator, and also the proposed radioactive waste clean-up plan for LANL. I would appreciate it if you would forward this to any other appropriate authorities, and I also hope to receive a response to my questions and concerns.

LOS ALAMOS HAZARDOUS & RAD WASTE INCINERATOR:

I attended the hearing on the incinerator held in Santa Fe earlier this month. The most glaring omission in my mind was the fact that the permitting process separated regulations on hazardous chemical waste and radioactive waste. I can't believe that the EID is even attempting to permit this incinerator without considering or including the effects of radioactive material on the incineration process. I think the EID should suspend making any decision on the permit unless and until this situation can be clarified and accomodated.

Also, currently NO regulations exist in the State of New Mexico to cover either radioactive or hazardous waste disposal. Isn't this rather like putting the horse before the cart? How can the public make informed decisions, much less regulatory authorities, when no laws yet exist to back them up? In addition, from my understanding of the plans for emission control on the incinerator, they seem to be totally inadequate and inefficient. Human error or mechanical breakdowns are barely addressed, yet these factors have been responsible for many "accidents" at other DOE facilities in the past. For these reasons, I strongly support Rep. Bill Richardson's legislative amendment to put a moratorium on the incinerator start-up.

The existing laws mentioned in the LANL material I've read are basically wrong and should be changed. Among these are the Atomic Energy Act law that gives the DOE the right to permit themselves for radioactive substances. This does not cover adequate safeguards on specific emission standards. The other totally ridiculous regulation (that I couldn't believe when I read it) is the NESHAP federal regulation about keeping airborne rad waste within a "fence line" of 25 mrem. How in the world would they be able to control this?



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Another point is the fact that there is no creditable independent over-site for monitoring LANL's activities by agencies that are not connected with or employed by the DOE. Talk about conflict of interest!

Finally, I feel that when the current laws and regulatory authorizations inhibit the laws themselves from functioning to protect the health and safety of the public, then the very purpose of the regulatory process is defeated. After much study and research, I truly believe that incineration of either chemical or radioactive, whether it's mixed or separate, is the wrong way to handle it. I would encourage the alternative of supercompaction, and increasing research into other alternatives to incineration. It's just too easy for this matter to get into the air, and that is utterly too dangerous.

#### LANL SITE CLEAN UP OF OLD WASTE

Once again, I attended the EPA hearings regarding clean-up at Los Alamos, and dutifully read the material there provided by LANL/DOE. I have two comments: 1) The material is very difficult for the average person to understand, and creates more confusion for the **reader** than clarification; 2) many different laws and regulations are referred to in the material, but the over-all impression I received is that the DOE will implement or abide by "only what is required under existing regulations". DOE should be using every resource or means at their disposal to go "above and beyond" the call of duty to handle their wastes so that the public is protected. This should be their first priority.

Then I read the front-page article of The New Mexican dated August 20. Not a very reassuring state of affairs! I will offer some quotes: "Laboratory officials are aware that radioactivity is being released into the air and soil". I have lived in the Santa Fe area for 13 years - does this mean that I and my loved ones have already been contaminated with plutonium? Also, the fact that the DOE/LANL and the entire nuclear industry has historically lied, covered up and mismanaged their facilities does not make me trust in their ability to manage it now. "The truth has been defined as what is not legally false" - again, it is intimated that the DOE will only abide by the rules it is legally forced to. "The report also says that area G IS contaminated and that radioactive materials ARE escaping". Yet in the same article, DOE official Vocke states that "if we felt there was a problem we would go to immediate remedial action". I feel that there IS a problem, that it is critical to deal with it NOW, and that every effort and expense should be put into this clean-up BEFORE any new waste is created, for whatever reason.

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I could go on and on about this article alone, but I'm sure you realize that myself and alot of other people are fed up with DOE's false information and non-forthcoming attitude in telling the public the TRUTH about escaped radioactivity in this area.

Therefore, I respectfully submit some suggestions to turn the tide on nuclear pollution of New Mexico and the rest of the country. Cleaning up the existing waste PERMANENTLY should be LANL & DOE's Number One Priority, over any new experiments or weapons production. With all of the great minds of the scientists there, they should be able to develop new technology to successfully dispose of this waste. Incidentally, with all the MANY problems and questions about the Waste Isolation Pilot Plant, I do not see WIPP as the solution.

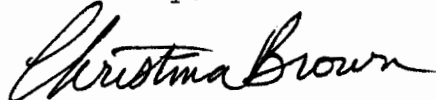
DOE, LANL, our lawmakers and government must realize that our planet Earth is dying and we are the ones killing it. These powers need to consider the big picture as far as our environment and its present and future protection. They need to look at new ideas regarding sustainable, reusable, NON-POLLUTING energy sources, and incorporate a respect for the preservation and continuance of Nature, which is what enables humans and all life forms to survive. The long-term economic benefits of reconversion to non-military, sustainable use of this technology would mean a new direction in education, research and study. This would take the pressure off corporations involved in nuclear to make money by maintaining the status quo of doing things "the way they've always been done".

There is at this time a great opportunity for the scientific community and government to join together with the "environmentalists" with the common goal of healing our planet, and creating a sustainable future for LIFE. Let's work together to solve these problems - which requires honesty on the part of the DOE, and a willingness to listen to new ideas.

The nuclear waste and weapons issue has created so much fear, anger and resentment on the part of the average citizen. It's time to break through the barriers of bureaucracy, and realize that the bottom line to any actions by the DOE and LANL should be protecting the health and safety of people and the environment. Because everything's connected.

Thank you for listening.

Sincerely,



Christina Brown

cc: Mr. William Gallagher, Dallas EPA

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