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Kieling, John, NMENV

From: Kathy Sanchez TWU [wanpovi@hotmail.com]
Sent: Monday, October 24, 2011 12:20 PM
To: Kieling, John, NMENV
Subject: regarding transuranic waste facility permit modification request by LANL
Attachments: John E. Kieling.pdf; JEK NMED(2).pdf

See Attached letter page 1 and 2. Thank you Kathleen Sanchez



John E. Kieling, Acting Hazardous Waste Bureau Chief

New Mexico Environment Department

2905 Rodeo Park Drive East, Building 1

Santa Fe, NM 87505-6303

Re: Request for NMED to Deny Permit Modification Request for Proposed Transuranic Waste Facility at Los Alamos National Laboratory

Dear Mr. Kieling,

I am opposed to the proposed Transuranic Waste Facility (TRUWF) Class 2 permit modification request from Los Alamos National Laboratory (LANL). **I respectfully request that the New Mexico Environment Department (NMED) deny the permit modification request.** This is so critical an issue and of grave concern for us community residents who live within a 12 mile radius and downwind of LANL.

Do not let a decision to be made without the cultural impact study being done for such a volume of hazardous waste storage in sacred lands. How can nature and wildlife have a chance to recharge, regenerate and heal from the cumulative and exponential harm being perpetrated by radioactive transuranic materials. This request is based on false assumptions and forces one to falsely superimpose an action of acceptance just because money is being spent to create a container so it leads to the assumption that a process of creating the waste is allowable since a permit will allow for the creating of the holder. What logic of the card shuffling does it take to look at the uninformed, unwillingly bodily container we all become to hold the rest of the unintended harm of exposures cause by generating unpredictable radioactive hazardous transuranic waste. Let us stop this madness to get more money to LANL to continue military war weaponry used for generational killing, traumatization of unwilling civil society and mother earth. Enough of this unethical reasoning , to create the tools for killing and destroying our sacred waters, lands and air just to privilege the killers with making killing weaponry. We humans are greater than the entities who function happily in the culture of violence who want a Class 2 modification of the hazardous waste permit, which provides for a 60-day public comment period, but no public hearing. In contrast, we are arguing that it is a major permit modification and meets the Class 3 standards, which provides for more public participation, including the opportunity to request a public hearing. **If the NMED does not deny the permit modification request, then NMED must determine that the LANL request is a Class 3 permit modification.** In 2007, LANL submitted a similar modification request as a Class 3. That request was subsequently withdrawn.

Here are additional reasonings more clearly named:

1. The modification request does not protect human health and the environment and must be denied. The proposed TRUWF could handle extremely large amounts of radioactive and hazardous transuranic waste for several decades and become a *de facto* permanent TRU waste facility. The modification request states: "LANL must have a continuing capability to process transuranic (TRU) waste and to ship that waste to the Waste Isolation Pilot Plant (WIPP) near Carlsbad, New Mexico." TRUWF PMR, Pg. 1.

The TRUWF is planned to operate until at least 2046 for **future** waste to be generated by nuclear weapons research, development and manufacturing at LANL. The only disposal site for TRU waste is WIPP, which pursuant to the NMED hazardous waste permit, ceases operations by September of 2030. Thus the TRUWF would operate for 16 years after WIPP closes, which means that the plutonium-contaminated waste would likely remain at the proposed LANL TRUWF in perpetuity. The modification request describes no disposal facility for the TRU waste other than WIPP, and the Department of Energy has made no plans for any other TRU repository. **NMED should deny the permit modification request because there is no disposal site for the transuranic waste to be stored at the proposed TRUWF after WIPP closes in 2030.**

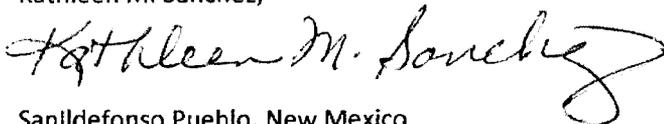
2. LANL must continue to focus on cleanup of legacy Cold War waste. The TRUWF will not manage the already buried waste, which is contaminating soils and migrating to surface and ground water. And since 1999, LANL has sent only 875 shipments of TRU waste to WIPP, which is fewer than 10% of all of the shipments. The fabric storage tents used for transuranic wastes at Area G have not been maintained; the fabric tents are ripped; the tents are open to the air and do not contain air monitoring equipment to determine releases of contaminants.

Two recent wildfires – the Cerro Grande and Las Conchas – have threatened the Area G disposal and storage area, human health and the environment. Both times fire fighting resources were devoted to protect the 40,000 plus drums of transuranic waste to the detriment of the Rio Grande watershed. Recovery has been slow and will be a lengthy process that could take decades, if not centuries.

I do not want any more waste storage at LANL. The record is clear: LANL waste storage threatens human health and the environment. Please deny the permit modification request for the proposed Transuranic Waste Facility at LANL. If the permit modification request is approved, it must be a Class 3 modification that allows for public comment and the opportunity to request a public hearing. In that case, I request a public hearing.

Sincerely,

Kathleen M. Sanchez,



Sanildefonso Pueblo, New Mexico