

316 Washington N.E.
Albuquerque, N.M. 87108

January 28, 2006

Mr. John Kieling, Program Manager
Hazardous Waste Bureau - N.M.E.D



Public Comments:

Ref: Sandia National Laboratory's
Mixed Waste Landfill Corrective Measure
Implementation Plan and Fate and Transport
Models:

Sandia's F&T model is not a comprehensive study and neglects to consider a number of areas of serious concern:

1. The model fails to consider biological transport of contaminants.
2. The model fails to consider human intrusion.
3. The model fails to consider beryllium and metallic sodium as potential contaminants of concern.
4. The model fails to consider animals, plants, and humans as "triggers."
5. The model fails to consider appropriate "trigger levels" for all contaminants in the known inventory.
6. The model should consider conducting a risk assessment for the F&T model

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that includes all waste types buried at the landfill, not just the risk posed by tritium, which is all the current assessment includes.

7. The data used for the F+T model are outdated. New data gathering should be used to verify the validity of the modeling.

These are just a few of the factors that should be reassessed. The people of New Mexico deserve to have the laboratories of this state comply with every possible safety procedure. The model for containment currently planned by Sandia Laboratory for the Mixed Waste Landfill does not insure the safety of our groundwater and soil for the long term.

There is still time to continue to study and reassess these multiple problems. The New Mexico Environment Department has an obligation to require Sandia National Laboratory to complete these necessary reassessments.

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3/ - I expect a response from NMED with regard to each of the concerns I have enumerated. We in New Mexico value our environmental department and trust that you will give due consideration to all of our valid concerns.

Sincerely,

Floy J. Barrett
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