

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

Feb. 6, 2006

Dear Mr. Kieling:

Please accept the following comments on Sandia National Laboratories (SNL) Mixed Waste Landfill (MWL), submitted on behalf of the Loretto Community of Catholic Sisters and Co-members. Sisters of Loretto have been serving the people of New Mexico for 153 years and have a deep love for the citizens and environment of this Land of Enchantment.

The SNL Fate and Transport Model (FTM) concluded that contaminants from the MWL will reach Albuquerque's sole source aquifer, Albuquerque's current source of drinking water, within a mere 50 years. Considering the seriousness of potentially contaminated drinking water, the FTM and the Corrective Measure Implement Plan (CMIP) are dangerously inadequate.

The FTM needs to be revised to consider the following issues:

1. possible transport of contaminants through animals and plants.
2. the ineffectiveness of a rock bio-intrusion barrier
3. comprehensive modeling of institutional controls against human intrusion
4. comprehensive analysis of potential human intrusion
5. model for all hazardous chemicals and volatile organic compounds known or suspected to be in the MWL
6. model for all potential new compounds which could be formed as a result of mixing radionuclides with non- radioactive materials
7. plan for monitoring, testing and dealing with contaminants that may show up in the future
8. risk assessment for all waste types buried in the MWL
9. recent data to verify the validity of the FTM, since the data used is outdated by at least 10 years
10. analysis of possible deterioration of each type of "container" for each type of waste buried in the MWL.

The CMIP should then be revised to include:

1. all the analysis of the revised FTM
2. a full long-term monitoring and maintenance program for public review and comment
3. demonstration showing how the proposed monitoring system will detect migration of contaminants.

While the above suggestions would make the MWL more secure, we are nevertheless convinced that the best plan to prevent the spread of contaminants and protect Albuquerque's groundwater would be to excavate the MWL and develop a comprehensive clean up plan to contain the waste in a safer area.

Respectfully,

Penelope McMullen, SL  
Regional J&P Coordinator  
Loretto Community  
113 Camino Santiago  
Santa Fe, NM 87501

[pmsl@cnsf.com](mailto:pmsl@cnsf.com)