

Kieling, John, NMENV

From: contactus@cardnm.org
Sent: Thursday, January 17, 2008 9:32 AM
To: Kieling, John, NMENV



Attachments: Sandia RCRA comments, Jan. 2008.doc



Sandia RCRA
omments, Jan...

Hi John,

Please find the comments of CARD and the Peace Center attached.

Would you send me a confirming e mail? Thanks.

Best Wishes,

Janet Greenwald

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John Kieling, Program Manager
New Mexico Environment Department
Hazardous Waste Bureau

January 17, 2008

Comments on the Draft RCRA Permit for Sandia National Laboratories

Due to the danger of real time and potential contamination to the large Albuquerque population, Sandia National Laboratories owes to its neighbors, a very comprehensive RCRA permit. However, the current permit on which we are asked to comment is incomplete.

Our organizations, Citizens for Alternatives to Radioactive Dumping, and the Albuquerque Center for Peace and Justice have not received documents necessary to evaluate contamination to our drinking water in regard to the draft permit, specifically, the tech-law documents, which are the basis for the current policy for leaving transuranic wastes perched above the aquifer used for drinking water in our community.

It is our position that some facilities at SNL are not properly permitted.

It is our position that not all the supporting documents upon the RCRA permit relies are available for public perusal.

It is impossible for our two groups to simultaneously review the SNL Draft RCRA permit and the long term maintenance permit for the mixed waste landfill, both of which impact a large part of our constituencies – we do not have the resources. This is an environmental justice issue of which the New Mexico Environment Department should be aware.

Also, there are permits within permits that are required to be reviewed by the public as part of the review of the RCRA permit for SNL with no guideline for review. This unfriendly and nearly impossible maze of reports is also, we believe, an ej issue.

We believe that our groups should have been notified of a public meeting regarding the permit so that we could clarify some of the above and below stated issues with NMED, however we were not invited to such a meeting.

Both of our organizations have been very involved in air monitoring of SNL; we do not see the kind of analysis for VOCs that would allow us to evaluate what air emissions are currently occurring. SNL has only four ambient air monitors. The combination of these two factors leave us with a lack of information to make the more complete comments we would like to submit.

Post closure care is inadequately dealt with in the permit.

Definitions in the permit are confusing, conflicting and incomplete.

We are at a loss to know why the consent order is not included in the permit. If there is an explanation for this omission, why is that explanation not included in the permit?

All waste units are not included in the permit.

The permit states that SNL will be receiving off-site wastes but the facilities from which these wastes are to come are not listed in the permit. The amount of the waste is not mentioned, nor a risk assessment for the transportation and storage of these wastes.

We object to the continuance of open air burning of hazardous wastes at SNL without public notice or proper pollution control and monitoring. We find no risk assessment for the impact of this burning on the

surrounding populations in the permit. If it was done, it should be provided as part of the permit. We do find the location of the site for open air burning in the permit. Again, SNL only has four ambient air monitors, an inadequate system for providing reassurance to the public that they are not being contaminated. Also, the readings for these monitors through 2004 show high rates of gross alpha emissions that might be in violation of the Clean Air Act.

The tank system at SNL is not adequately characterized. A number of these tanks seem to be beyond the age for which they were designed. These tanks could be leaking and be a danger to ground water, yet no monitoring system is mentioned concerning them.

An inadequate amount of information is available concerning the auxiliary hot cell. We do not see any records of the kind or amounts of materials which are used nor of the waste that is generated. We are concerned about the tent-like structure which is apparently holding waste from the cell. We do not see any mention of monitoring systems for this tent or of other storage areas surrounding the hot cell.

We are concerned that there is no mention of monitoring systems for the storage silos.

The Monzano Storage Bunkers have no attendant air monitors, even though we know that nuclear bombs are tritium emitters. There is no tritium monitoring at SNL even though recent studies show that tritium is very dangerous to young children and the fetus. (IEER website)

As has been well documented by Bob Gilkeson and Citizen Action, the Mixed Waste Landfill is not being adequately monitored for ground water contamination.

The 'yard holes' are not dealt with in the permit, even though they could be a threat to ground water. For this reason alone, the contents and locations of these dump sites should be examined in the permit and a full analysis given.

Our comments on the Chemical Waste Landfill have not been answered leaving us unable to comment on that facility as part of the RCRA permit.

The LTMMP seems to contradict the Consent Order.

Citizens for Alternatives to Radioactive Dumping and the Albuquerque Center for Peace and Justice request a formal hearing on the RCRA Draft Permit for Sandia National Laboratories.

This ends our preliminary comments on the SNL Draft Permit. Thank you for your consideration.

Janet Greenwald
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