



Kieling, John, NMENV

From: Rhgilkeson@aol.com
Sent: Friday, November 09, 2012 2:33 PM
To: Kieling, John, NMENV
Cc: rhgilkeson@aol.com; ccns@nuclearactive.org; dave@radfreenm.org; contactus@cardnm.org; mccoydb01@msn.com
Subject: Request for 90-day extension to public comment on the SNL LTMMP and Draft Permit

November 9, 2012

Dear Mr. Kieling,

I am sending you this email on behalf of Dave McCoy (Citizen Action), Joni Arends (Concerned Citizens for Nuclear Safety), Janet Greenwald (Citizens for Alternatives to Radioactive Dumping) and myself, Robert H. Gilkeson, Registered Geologist. We respectfully request a 90-day extension to the comment periods for (1) the March 23, 2012 SNL proposed Long-Term Monitoring and Maintenance Plan (LTMMP) for the SNL MWL (comments currently due on November 13, 2012), and (2) for the SNL draft Permit (comments currently due on November 16, 2012).

The issuance for public comment of the SNL Revised Permit and the Kirtland Air Force Base Permit concurrently with the SNL MWL proposed LTMMP places too short a timeframe for review and comment for three lengthy documents. Reviewing all three documents is an especially unacceptable burden on the public and because of incomplete references and the size of the documents. Our request for the 90-day extension is reasonable especially because of the approaching busy holiday season Thanksgiving through New Years.

The public comment period for the Draft SNL Permit currently ends on November 16, 2012. A very serious mistake is that the draft permit lists the SNL MWL as SWMU 76 whereas RCRA requires closure of the MWL as a regulated unit. The required closure process for the MWL with closure plan and post-closure permit is not provided in the Draft Permit. We respectfully request NMED to retract the Draft SNL Permit and correct this serious omission.

We respectfully request a public hearing on the Draft SNL Permit. Further, and prior to any notice of public hearing, pursuant to 20.4.1.901. A.(4) NMAC, we request that NMED, the Permittees, we, and other parties conduct negotiations to attempt to resolve issues related to the draft permit. We believe that other parties and NMED would agree with some of the concerns and objections raised in the comments we are currently preparing and that a revised draft permit could be developed prior to the public hearing.

Please respond soon to our request for a 90-day extension for public comment on the Draft SNL Permit and the SNL proposed LTMMP for the SNL MWL.

Sincerely,

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cc: Dave McCoy, Joni Arends and Janet Greenwald

