



November 12, 2012,
John Kieling,
Chief of NMED
Hazardous Waste Bureau
Rodeo Park Drive East, Bldg. 1
Santa Fe, New Mexico 87505

Dear Mr. Kieling,

Citizens for Alternatives to Radioactive Dumping (CARD) requests an extension of time for the public comment period and requests a public hearing for the Sandia National Laboratories (“SNL”) Draft Hazardous Waste Permit (“Permit”) and Granting of Corrective Action Complete Status (“CAC”) for the Solid Waste Management Units/Areas of Concern.

1) The full documentation necessary for review of the Permit and the CAC have not been posted on the NMED website and the SNL website. CARD requests a 90-day extension to the February 14 date for submission of comments be granted.

2) CARD participated in negotiations concerning the draft permit several years ago during which time CARD gained understanding of the complexity of the information needing review and the difficulty, at times, of obtaining the information necessary to do that review. For instance, the maps given the stakeholders during the negotiations did not identify locations by longitude and latitude. CARD will need to subcontract in order to review the entire permit and, to do that, we will first need all the relevant documents. After we obtain the documents, we believe that 90 days is a minimal time to allocate responsibilities, assess the document and compose comments. We are, as are most SNL stakeholders, resource-light and are being presented by other deadlines during the same time period. Due to the complexity of the permit and the slim resources of the stakeholders, we consider an extension to the comment period an environmental justice issue.

3) The Hazardous Waste Permit submission is incomplete because it lacks a Closure Plan and Post Closure Permit for the Mixed Waste Landfill dump. The MWL dump is listed only as SWMU 76. The MWL is a regulated unit because it received waste after July 26, 1982.

We look forward to your reply to our request.

Respectively Submitted,
Janet Greenwald, Co-coordinator CARD
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