

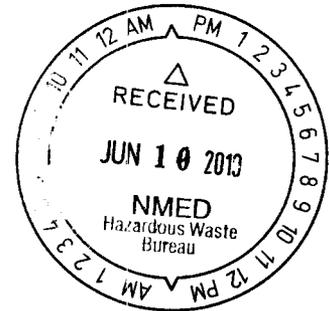
MWL

 **ENTERED**

June 1, 2019

William P. Moats
P.O. Box 679
Bisbee, AZ 85603

Dave Cobrain, Program Manager
Hazardous Waste Bureau - New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303



Ref: Sandia National Laboratories – MWL Five-Year Report, January 2019

Dear Dave,

I am providing comment on the Sandia National Laboratories' Five-Year Report (Report) for the Mixed Waste Landfill (MWL) in accordance with Public Notice No. 19-002, issued May 24, 2019. As you are aware, I worked for the Hazardous Waste Bureau as the Project Lead for the MWL until I retired at the end of year 2015. As a matter of full disclosure, I have been in recent contact with a representative of Sandia National Laboratories concerning the Report. However, my comments are my own; I have not asked for or received any compensation from anyone on this matter.

I have read through the Report, including the supporting appendices. A lot of work obviously went into the reevaluation of the excavation alternative. Sandia National Laboratories did a good job laying out in the Report the complexity of such a project, should excavation be performed, as well as providing time and cost estimates to accomplish it. Although one may argue that there may be ways to reduce time to perform some of the tasks, and cut costs, excavation of the MWL due to its unique contents would undoubtedly be expensive and take considerable time to complete. Furthermore, the entire operation would be difficult to implement from both a technical and regulatory standpoint, and from the perspective of doing the work in a safe manner.

Although excavation is technically feasible, it is unnecessary because as indicated in Chapter 2 of the Report monitoring of the groundwater and other environmental media show that the remedy implemented for the landfill is protective of human health and the environment. Furthermore, revision of the Fate and Transport Model for PCE (Chapter 3 of the Report) predicts little chance that PCE, the mobile hazardous contaminant of most concern, will contaminate groundwater in excess of the water quality standard. It is also clear that the MWL cover and related systems are being inspected and maintained. Because the remedy is protective, the risk to workers from any exposure to the radioactive component of waste contained in the

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MWL would be unwarranted, even if that risk is now lower due to the radioactive decay that has occurred since the final remedy has been implemented. In conclusion, the MWL should not be excavated given the current conditions and the reasonable expectation that these conditions will not change for the worse in the foreseeable future.

I find that the Report meets the requirements found in the 2005 Final Order for Corrective Measures, the 2012 Long-Term Monitoring and Maintenance Plan, and the 2016 Final Order for Corrective Action Complete with Controls. It should be approved by the New Mexico Environment Department.

Thank you for consideration of my comments. If you have any questions, I can be reached at 505-933-0436.

Sincerely,

A handwritten signature in black ink, appearing to read "William P. Moats", with a long, sweeping horizontal line extending to the right.

William P. Moats