



**From:** Cobrain, Dave, NMENV  
**Sent:** Thursday, July 25, 2019 3:51 PM  
**To:** Allen, Pam, NMENV  
**Subject:** FW: [EXT] Mixed Waste Landfill

**From:** Timothy Peterson <petersontimpaul@gmail.com>  
**Sent:** Tuesday, July 23, 2019 8:26 AM  
**To:** Cobrain, Dave, NMENV <dave.cobrain@state.nm.us>; Kieling, John, NMENV <john.kieling@state.nm.us>; Stringer, Stephanie, NMENV <Stephanie.Stringer@state.nm.us>; Kenney, James, NMENV <James.Kenney@state.nm.us>  
**Subject:** [EXT] Mixed Waste Landfill

Dear NMED Officials:

I write to encourage you to issue an order for Sandia National Laboratories to proceed with a Corrective Measures Implementation Plan for the excavation and offsite disposal of the toxic materials contained in the Mixed Waste Landfill (MWL).

Sandia National Laboratories' Five-Year Review proposes that planning and implementation for excavation and offsite disposal of radioactive and toxic chemical wastes in the MWL is feasible and can be conducted safely. Sandia says the process can begin by the New Mexico Environment Department (NMED) issuance to Sandia of an Order to produce an excavation Corrective Measures Implementation (CMI) Plan. Sandia's Five-Year Review provides the evidentiary basis for the NMED to move forward with an Order for excavation.

I support Sandia's recognition, in the Five-Year Review, that the best alternative for the MWL is excavation with offsite disposal. The Environment Department Secretary's 2016 Final Order specifies that the existing dirt cover "may not be the most appropriate long-term solution for the [MWL] site."

Sandia states that the preferred alternative is excavation with offsite disposal as a remedy, rather than the onsite disposal alternative (Five-Year Review Section 5.4).

According to the Five-Year Review:

- excavation with offsite disposal, as compared to onsite disposal, presents less expense, less risk to workers and the public, less time, a smaller footprint, and less time devoted to regulatory matters;
- the disposal pathways currently exist for the offsite disposal of all the wastes, along with available onsite processing facilities;
- excavation could allow the current dump site to become available for industrial use;
- excavation can be accomplished by conventional and remote-controlled robotic equipment;
- radionuclides, such as Cobalt 60 and Tritium, have decayed to levels that are acceptable for worker safety.

Several strong reasons exist for excavation of the MWL:

1. The MWL represents a permanent threat to the safety of the Albuquerque community. The MWL is located near Albuquerque, Isleta Pueblo, the Sunport, and the growing urban area and children's park of Mesa del Sol.
2. The existing dirt barrier installed above the wastes cannot protect the public and Albuquerque's drinking water aquifer from the long-lived radionuclides and toxic chemicals.
3. The dump contains hundreds of solvents, heavy metals, and radionuclides in unlined pits and trenches, leaking into Albuquerque's drinking water aquifer. These are the most toxic types of waste on the planet, resulting from nuclear weapons production, nuclear reactor meltdown testing, and the military. They include

Plutonium-239, Americium-241, Cesium-137, U-235, mercury, lead, PCE, PCBs, beryllium, and cadmium. Chlorinated solvents, such as TCE, are already leaking from the dump into Albuquerque's drinking water aquifer.

4. These wastes must be monitored forever, but there is no plan for that.

5. Canisters in the MWL that contain metallic sodium and high-level spent fuel from nuclear reactor meltdown experiments can corrode and catastrophically explode, breaching the dump's dirt cover and spreading radiation into Albuquerque's air, soil and water – the equivalent of a dirty bomb.

6. An independent study by the New Mexico State University-affiliated Waste-management Education Research Consortium (WERC) concluded that the nature and amounts of hazardous and radioactive materials stored at the MWL, plus the location of the site next to a growing metropolitan city, represent a long-term potential hazard to both humans and the environment. If the site is not excavated, it will be a permanent legacy issue for the US Department of Energy (DOE).

7. Sandia has experience excavating its dumps, as evidenced by the excavation of the Chemical Waste Landfill, which was completed without incident.

8. Ordering excavation of the MWL sets a strong precedent for cleanups/excavation at other DOE facilities in New Mexico, including those at Los Alamos National Laboratory.

I encourage the New Mexico Environment Department to immediately issue an Order for Sandia National Laboratories to proceed with a Corrective Measures Implementation Plan for the excavation and offsite disposal of the long-lived toxic and radioactive chemicals contained in the Mixed Waste Landfill.

Thank you for your consideration of my comments.

Sincerely,

Timothy P. Peterson