



Department of Energy
Carlsbad Area Office
P. O. Box 3090
Carlsbad, New Mexico 88221

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NM ENVIRONMENT DEPARTMENT
OFFICE OF THE SECRETARY

OCT 10 1995

Mr. Ed Kelley, Director
Waster and Waste Management Division
New Mexico Environment Department
Harold Runnels Building
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, NM 87502

Dear Mr. Kelley:

Thank you for the New Mexico Environment Department's (NMED) comments on the draft Environmental Assessment (EA) for operation of the Carlsbad Environmental Monitoring and Research Center (CEMRC). We will incorporate the change suggested by your staff in the hazardous waste discussion to recognize that the hazardous waste disposal site might also be permitted by the state in which it is located.

The NMED comments indicate that the EA does not "adequately justify" the proposed action. The reasons given are that the Environmental Evaluation Group (EEG) and the NMED are already providing environmental monitoring of the WIPP site, that the whole body counting capability that CEMRC would provide is not needed for Carlsbad residents because of the negligible dose consequences that would result from WIPP operations and that the monitoring could be obtained from other sources for WIPP workers.

An EA is not a decision making document that provides the reasoning to "justify" the agency's decision. An EA is intended to provide an objective analysis of the environmental impacts of an agency's proposed action and alternatives to that proposed action so that the agency can consider those impacts in deciding whether to proceed with the proposed action. NMED's comment letter agrees that the proposed action "entails minimal environmental impacts," but appears to question the need for the proposed action. Under these circumstances, I am issuing a Finding of No Significant Impact for the proposed action.

I believe there is a need for the proposed action. NMED admits in its comments that there is a need for bioassay of WIPP radiation workers, and indicates that there may be a need to fill in "gaps" in the NMED and EEG monitoring. While it might be possible to provide for these needs by providing additional funding to NMED or EEG, continued funding for the CEMRC would also fulfill these needs. In addition, the CEMRC monitoring program would also fulfill other DOE needs.

One of the primary objectives of the CEMRC program is to obtain data on the movement of pollutants associated with waste disposal operations in the environment and develop better techniques for detecting low levels of pollutants. To obtain this data, CEMRC would monitor for changes in the level of pollutants near the



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threshold of detection, which are well below the levels that might be expected to cause adverse health impacts. DOE believes that this information will enable it to improve the way it handles and disposes of its wastes in the future. This need is reflected in the second paragraph of the statement of purpose and need (Draft EA, Section 2.1, page 1). Existing monitoring programs are aimed at detecting pollutant levels that might cause adverse health or environmental impacts and would not fulfill the same need as the proposed CEMRC program would.

If you have any questions concerning this proposal or need further information, please contact Harold Johnson, the Carlsbad Area Office NEPA Compliance Officer at (505) 234-7349.


George E. Dials
Manager