Kieling, John, NMENV

From: Loralee Makela [lrlmkl1@gmail.com]
Sent: Saturday, May 01, 2010 5:26 PM
To: Kieling, John, NMENV
Subject: Letter concerning the Lack of Groundwater Protection Req. in Proposed Hazardous Waste Permit for LANL

Date: May 1, 2010

John E. Kieling, Program Manager
Hazardous Waste Bureau - New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
E-mail: john.kieling@state.nm.us

Re: Lack of Groundwater Protection Requirements in Proposed Hazardous Waste Permit for Los Alamos National Laboratory

Dear Mr. Kieling:

I provide the following public comments about the lack of groundwater protection requirements in the proposed Hazardous Waste Permit for Los Alamos National Laboratory (LANL).

The Environmental Protection Agency (EPA) has designated the Española Basin as a sole source aquifer, meaning that the Española Basin is the sole drinking water source for the area between the Jemez and Sangre de Cristo Mountains , running from Tres Piedras, to the north, to almost Galisteo, to the south.

Since operations began in 1943, LANL has buried over 21 million cubic feet of radioactive, hazardous and toxic wastes in unlined pits, trenches and shafts dug into the volcanic tuff. The LANL groundwater monitoring network has been under development since 1998 and has yet to provide reliable and representative samples of groundwater from the regional aquifer.

I am particularly concerned about the lack of detection and compliance groundwater monitoring for the "regulated units," Areas G, H and L, at Technical Area 54 (TA-54). I quote the March 19, 2010 written testimony by James Bearzi, Bureau Chief of the NMED Hazardous Waste Bureau:

> "... groundwater contamination has already been detected beneath the regulated units at TA-54 ... ." p. 62.

Groundwater beneath LANL discharges to the springs at the Rio Grande . Albuquerque residents are already drinking water from the Rio Grande and Santa Fe residents will begin next spring.

It is time to get back to basics. NMED must require LANL to install wells drilled only with air. These wells must be able to detect contamination and provide the necessary information in order to implement corrective action, or "cleanup," in an efficient and cost effective manner.

Already too much taxpayer money has been wasted drilling defective wells, collecting and analyzing samples from defective wells and reporting data to the public that is unreliable.

Thank you for your careful consideration of my comments.

Sincerely,

Loralee Makela

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