

Kieling, John, NMENV

From: drannmcc@aol.com
Sent: Friday, May 07, 2010 6:09 PM
To: Kieling, John, NMENV
Subject: Comments on LANL Hazardous Waste Permit
Date: May 7, 2010

To: John E. Kieling, Program Manager
Hazardous Waste Bureau - New Mexico Environment Department
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From: Ann McCampbell, MD
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Re: Revised draft Hazardous Waste Permit for Los Alamos National Laboratory
(LANL), February 2, 2010

Dear Mr. Kieling:

The Multiple Chemical Sensitivities (MCS) Task Force of NM is a statewide advocacy organization comprised of chemically sensitive New Mexicans and supporters. We are dedicated to increasing awareness of MCS and educating others about the hazards of high and low level chemical exposures.

MCS is a serious and growing public health problem that affects people of all ages, races, and economic backgrounds. A random survey conducted by the NM Department of Health found that 16% of the state's respondents reported being unusually sensitive to chemicals, such as household cleaning products, paints, perfumes and insect sprays.

Most people with chemical sensitivities also get sick, some severely so, from exposure to other air contaminants, especially smoke. Burning of contaminated materials creates particularly toxic smoke.

In addition to those with chemical sensitivities, approximately 26% of the population is under the age of 18, 12% are over 65 years of age, 11% of adults have asthma, and approximately 20% have cardiovascular disease. All of these groups are known to be at increased risk of harm from air pollutants.

In order to better protect people with chemical sensitivities, asthma, children, the elderly and others who are disproportionately affected by poor air quality, we make the following recommendations:



- 1) Deny LANL's permit applications for open air burning of hazardous waste.
- 2) Require DOE/LANL to install confined burn facilities as an alternative to open burning before any permit is finalized. The permit must include limits as to the type and amount of waste and the frequency of burns.
- <!--[if !supportLists]-->3) <!--[endif]--> Include requirements for NMED and DOE/LANL to provide enhanced participation as required by EPA for *“early, often, continuous and meaningful contact with the public”* for any burning activities.
- <!--[if !supportLists]-->4) <!--[endif]--> Require DOE/LANL to establish both a physical Information Repository in the Española Valley, as well as a virtual (electronic) Information Repository before a permit is finalized.
- <!--[if !supportLists]-->5) <!--[endif]--> Require DOE/LANL to meet the emergency management, planning, preparedness and response requirements.
- <!--[if !supportLists]-->6) <!--[endif]--> Require DOE/LANL to meet all of the financial assurance requirements for each of the 24 hazardous waste management units.

It is essential that NMED exercise its authority and mandate to minimize air contamination in the state. Open air burning of hazardous waste by LANL should be prohibited. LANL should be required to use alternative methods of hazardous waste disposal, including, but not limited to, using confined burning facilities. In addition, burning of hazardous waste should **not** be exempt from state smoke regulations.

LANL should not be allowed to shift costs to the public. Too often, government agencies use burning to achieve a goal because it is cheaper than alternatives. This can reduce costs to government, but increase costs of those who get sick from the smoke and/or must evacuate the area in order to protect themselves from it. It is unfair to burden the public with medical bills and costs of transportation, alternative lodging, masks, air filters, lost work, and other expenses they may incur as a result of LANL's open burning. It is also unacceptable to put public health at risk for the lab's convenience.

Thank you for the opportunity to comment on this important matter.

Please keep me informed of the outcome of the hearing and permit process.

Ann McCampbell, MD