



Kieling, John, NMENV

From: Rachel Conn [rconn@amigosbravos.org]
Sent: Friday, May 07, 2010 10:50 AM
To: Kieling, John, NMENV
Cc: Brian Shields
Subject: Comments - Hazardous Waste Permit
Attachments: 100507.HazwasteLANL.pdf

Please find Amigos Bravos' comments on the draft Hazardous Waste Permit.
-Rachel

Rachel Conn
Amigos Bravos
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Friends of the Wild Rivers

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May 6, 2010

Mr. John E. Kieling, Program Manager
Hazardous Waste Bureau – NMED
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87595-6303
Email: john.kieling@state.nm.us

Delivered via electronic mail

Dear Mr. Kieling,

As a statewide river conservation organization based in Taos and Albuquerque, Amigos Bravos, Friends of the Wild Rivers, works to protect the ecological and cultural richness of the Río Grande and other rivers in New Mexico. Amigos Bravos is committed to the use of state and federal regulatory processes to stop ground and surface water pollution migrating from LANL facilities into our state's water resources. Amigos Bravos has specifically been working to protect and restore water quality and quantity in White Rock Canyon. Amigos Bravos believes that by preventing additional pollution from being released from LANL, and by requiring clean up of historic releases, the public's right to clean water will be protected.

Amigos Bravos, Friends of the Wild Rivers submits the following comments on the 2/2/10 revised draft Hazardous Waste Permit for Los Alamos National Laboratory (LANL):

1. Amigos Bravos strongly supports section 4.6 of the proposed permit. We are concerned about the revelations in testimony yesterday from Tony Griggs about recent transfers of tritium contaminated waters from TA-50 to TA-53. We are particularly concerned that LANL has not found the source of the tritium contamination in the water collection system for TA-50, which has necessitated trucking elevated levels of tritium contaminated water from TA-50 to the evaporation ponds at TA-53. The October 30, 2009 notice to the Environmental Protection Agency (EPA) indicates that LANL has or plans to transport 200,000 gallons of tritium contaminated water, at levels above the drinking water standard of 20,000 picoCuries per gram (pCi/L), to TA-53. This may constitute a change of the location of the discharge under the Clean Water Act, requiring a permit modification request and opportunity for public review and comment and request for hearing.

2. Amigos Bravos strongly supports the denial of open air burning of hazardous waste at LANL and supports NMED's proposed requirement to install confined burn facilities.
3. Amigos Bravos urges NMED to include additional public participation components in the permit to ensure that the public is kept informed. These additional components must include requirements to notify the public of all draft documents and reports, requirements to hold public meetings on a regular basis and requirements to notify the public about opportunities for input into the decision making process. In addition, to ensure that all New Mexicans are able to participate in the process, both an electronic and physical Information Repository must be required.
4. Amigos Bravos supports the financial assurance requirements in the draft permit. Adequate financial assurance will ensure that the public and the state of New Mexico is not left footing a cleanup bill at LANL.

Sincerely,

Rachel Conn
Clean Water Circuit Rider
Amigos Bravos