

Permit



**From:** John Ahlquist [mailto:john.ahlquist@sbcglobal.net]  
**Sent:** Saturday, October 31, 2009 1:28 PM  
**To:** Bearzi, James, NMENV  
**Cc:** Goldstein, Jon, NMENV; King.Laurie@epamail.epa.gov  
**Subject:** Re: Request for Public Hearing

Dear Mr. Bearzi:

Thank you for your response. I believe a number of my comments could be cleared up through permit revisions as follows:

1. Table K-1 should be relabeled.
2. Drum limits for sealed sources should be removed and a phrase added to ensure they are at LANL no longer than one year before going to WIPP.
3. Soil cleanup levels should be based on credible land use scenarios and not residential or industrial land use.
4. All the sites slated for review should be examined for regulatory consistency. Borrow pits from the 1940s, old residential use septic tanks, etc., would likely be removed if NMED has not required their review by others in New Mexico.
5. A significant cleansing of the administrative record could be done. For example, it is difficult to see how a 1938 technical paper on milk anemia applies to the LANL RCRA efforts.

Many of my comments have to do with process and I don't know how you intend to deal with them. I would be interested in hearing your thoughts on that.

Since others have different comments, has NMED started meeting with them and the applicants to resolve those comments? If yes, what is your process for setting meetings and inviting attendees?

As an aside, I was involved in the mid-1990's in the Rocky Flats compliance negotiations. After the lieutenant governor attended a meeting and helped get things on the right track, the negotiations were resolved and work started. The entire Rocky Flats plant was cleaned up by 2005 or so. The last time I was there, there was nothing but a gravel road leading to where the plant used to be.

I urge NMED to have a bias for action.

A. John Ahlquist

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