

TAS4

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February 4, 2008

John E. Kieling, Program Manager
NMED Hazardous Waste Bureau
2905 Rodeo Park Drive West, Building 1
Santa Fe, NM 87505

Dear Mr. Kieling:

The Pueblo de San Ildefonso (Pueblo) Department of Environmental and Cultural Protection (DECP) has completed a review of the Los Alamos National Laboratory (LANL) RCRA Corrective Measures Study (CMS) for Material Disposal Area (MDA) H. Comments are included below.

In general, DECP is opposed to hazardous waste being left in place in proximity to Pueblo property. However, in this case, we must acknowledge the hazards to worker safety and transportation safety which would be incurred by the removal of the wastes from MDA-H. If waste is to be left in the shafts, DECP would prefer the most protective option possible, which should include Corrective Measure Alternative 3b: Complete Shaft Encapsulation.

Thank you for providing the opportunity to address our concerns.

Sincerely,

Neil S. Weber, Director
Department of Environmental and
Cultural Preservation
Pueblo de San Ildefonso

Attachment

COMMENTS ON LANL MDA-H CMS BY SECTION

2.1.3.1 Climate and Ecology

The last paragraph discusses low precipitation and high evapotranspiration rates. Short duration/high precipitation events should be discussed also.

2.1.3.2 Geology, Hydrology, and Tectonics

This section should discuss surge beds and their possible contribution to accelerated downward movement of contaminants.

2.5.3 Corrective Measure Alternatives 3a and 3b: Shaft Encapsulation and Engineered ET Cover

3b: Complete Shaft Encapsulation

This section states; "However, complete encapsulation may (emphasis added) limit air circulation within the mesa top. This may (emphasis added) in turn result in potentially higher in situ moisture levels, nullifying the benefits of the engineered ET cover and increasing the potential for uranium hydride formation (Appendix M). This is a great deal of uncertainty. Is there data on air flux in the mesa top? This could be used to calculate a mass balance for evapotranspiration, thus reducing the uncertainty.

3.1.1.1 Performance of Alternatives 1, 2, and 3

The CMS should acknowledge that LANL modeling is highly conjectural and that the subsurface is not well-characterized.

Concrete is more likely to crack than erode.

3.1.3.1 Reliability Evaluation of Alternative 1: Upgrade Existing Surface Layer

Concrete is more likely to crack than erode.

3.3.1.3 Long-Term Impacts Assessment of Alternative 1

A gravel-mulch layer seems inadequate.

5.0 RECOMMENDED CORRECTIVE MEASURE

This section states; "Alternative 2 provides equal protection to human health and the environment compared to the other alternatives." It is counterintuitive that Alternative 2 would provide equal protection when Alternative 3 provides more barriers.