

**Concerned Citizens for Nuclear Safety
Dr. Maureen Merritt
Tewa Women United**

February 27, 2015

By email to: DarenK.Zigich@state.nm.us and
Cember.Hardison@state.nm.us

Daren Zigich, P.E.
Air Quality Bureau – Major Source Permit Section
New Mexico Environment Department
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Cember L. Hardison
Air Quality Bureau – PSD Program Manager
New Mexico Environment Department
525 Camino de los Marquez, Suite 1
Santa Fe, NM 87505-1816

Re: Air Quality Operating Permit Application No. P100-R2
NSR Permit No. 2195H and 2195BM1
TEMPO/IDEA ID No. 856 – PRT20050001
Los Alamos National Laboratory

Dear Mr. Zigich and Ms. Hardison:

Thank you all for your time on Tuesday, February 24, 2015 to discuss the concerns of Tewa Women United (TWU), Dr. Maureen Merritt, and Concerned Citizens for Nuclear Safety (CCNS) regarding our February 2, 2015 responses to the New Mexico Environment Department (NMED) January 26, 2015 response to our January 18, 2015 public comments and questions regarding the draft-proposed Los Alamos National Laboratory (LANL) Title V Air Quality Operating Permit No. P-100-R2 in the above-referenced Title V air quality-operating permit. We understand that the NMED intends to issue the permit on or before February 28, 2015.

We reiterate the comments of Kathy Sanchez, of Tewa Women United (TWU), during the call. TWU works to protect the most vulnerable, including pregnant women and children, from exponential harm and environmental violence, and promotes

environmental justice for all. Ms. Sanchez reminded the Department that LANL is not a normal business. Daily operations include working with hazardous and toxic materials across the 40-square mile facility. Many of the operations are covered by the Title V permit.

Dr. Maureen Merritt talked about her experience with people exposed to beryllium and chronic beryllium disease. She continues to communicate with the Department's Occupational Health and Safety Bureau (OHSB). She also expressed concerns about exposure to TCA.

Joni Arends, of CCNS, spoke about concerns about whether LANL was a major source and expressed concerns about LANL self-imposed limits to remain a minor source for Hazardous Air Pollutants (HAPs) and PSD.

We understand that the Department does not have the regulatory authority to address all of our concerns. We acknowledge, and appreciate, that the Department is including conditions in the proposed permit for the Permittees to:

1. verify that its claimed insignificant sources are, in fact, insignificant. NMED AQB Response to comments and questions received on February 2, 2015 regarding Draft-Proposed LANL Title V Air Quality Operating Permit No. P100-R2, February 26, 2015, Sec. 7, p. 6, and Sec. 8, p. 8.
2. Report the emissions from the Soil Vapor Extraction (SVE) units located at Material Disposal Area (MDA) L at Technical Area (TA) 54 in the Title V semi-annual emission reports. Id.
3. Post initial startup notifications in the Electronic Public Reading Room. Id., Sec. 16, p. 12.

In lieu of a public hearing, we respectfully request that the Department require LANL to:

1. Establish stack monitoring for all beryllium operations and facilities where beryllium was used. There have been several instances where beryllium has been held up in the ventilation systems. Members of the public have been exposed while visit facilities where beryllium was used, e.g., the storage cave at TA-41.
2. Establish air monitoring for HAPs, Volatile Organic Compounds (VOC) and radioactive tritium at the Mechanical Evaporator System (MES) at TA-50 and the two Solar Evaporative Tanks (SET) at TA-52.
3. Install carbon filtration on the two Soil Vapor Extraction (SVE) Units at MDA L.

We suggest creating a side agreement between the Department, the Permittees and us, similar to the one used for the construction permit for the Chemistry and Metallurgy

Research Replacement Building at TA-55 in September 2005. CCNS and TWU were parties to that agreement.

Again, thank you for your careful consideration of our comments and requests. Please contact us with your comments and questions.

Sincerely,

Kathy Sanchez, Environmental Health and Justice Program Manager and
Gathering for Mother Earth
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