

CCNS and EVEMG Comments Regarding Air Issues in the draft LANL SWEIS

Open Air Burning and Explosions using Depleted Uranium and High Explosives. DOE/NNSA proposes to process 87,000 pounds of high explosives and up to 6,900 pounds of depleted uranium (DU) for dynamic experiments and studies annually in open air burning and explosions. The No Action Alternative and the Expanded Operations Alternative are the same for the High Explosives Testing Facilities to conduct approximately 1,800 experiments per year using the 6,900 pounds (3,130 kilograms) of DU.

While we oppose these experiments, within the DOE/NNSA complex, facilities exist where similar experiments are conducted in enclosed, double-walled facilities with extensive air filtration systems. The particulates and toxic air pollutants are collected as opposed to the activities at LANL where the materials are dispersed into the open air to be deposited on the land and flow during rain and melting snow events through the watersheds to the Rio Grande and into other downwind watersheds.

DOE/NNSA must monitor and implement comprehensive sampling programs, including but not limited to, air at all open burning and open detonation sites and for all activities using high explosives and depleted uranium. DOE/NNSA have reduced the number of air monitoring stations surrounding the sites where these burning and explosive activities continue to take place. Specifically, AIRNET stations 77, 78 and 79, which were located in the downwind direction from the Dual-Axis Radiographic Hydro Test Facility (DARHT) have been turned off and possibly removed.

DOE/NNSA propose to conduct 100 major hydrodynamic tests annually. S-41. CCNS and EVEMG oppose the claim that there will be no harm from these tests. Please see the video of the September 6, 2006 RRW Hydro test that LANL recently posted on its website: http://www.lanl.gov/news/newsbulletin/QuickTimes/rrw_darht_2.mov. It is clear from this video that there are releases from experiments at the DARHT facility. DOE/NNSA cannot be allowed to continue stating that there will be no harm from these activities simply because they have no data to prove otherwise.

CCNS and EVEMG have been involved in a long process requesting that AIRNET stations 77, 78 and 79 be turned back on. These AIRNET stations are located on the firing sites and near DARHT. The highest measurements of DU on the LANL site were recorded at these stations. We demand that these AIRNET stations be turned back on and that bi-weekly sample collection and analysis take place. We demand that the data be posted in a timely manner on the Internet as well as included in the annual Environmental Surveillance

Reports.

Further, the 1979 LANL Final Environmental Impact Statement estimates that 220,000 pounds of depleted uranium were used in dynamic experiments during the history of LANL. From 1979 to present we do not know how much DU and high explosives have been used in experiments and remains in the environment. In order to understand what remains in the environment, extensive soil sampling on lands downwind and downstream of LANL is required and must be implemented immediately, with citizen oversight.

Toxic and Hazardous Air Pollutants. DOE can no longer hide under the New Mexico “grandfather clause,” which allows for facilities existing before December 31, 1988 to emit toxic air pollutants without regulation. For instance, “the amounts of toxic materials used and the amounts emitted to the air continue to show considerable variation. Although the actual quantities and chemicals vary from those analyzed in the 1999 SWEIS, the concentrations to which the public is exposed continue to be below levels of potential consequences.” S-30. Yet, there are many of these toxic material emissions for which there are no federal and state standards. Further, DOE’s sister agency, the Department of Defense continues to work towards removing already listed chemicals from the toxics lists in spite of known harmful effects.

The DOE must support the regulation of toxic and hazardous air pollutants from its facilities. This holds true for LANL as it is a research and development facility, which creates new toxic and hazardous materials in order to further its national security mission. If DOE/NNSA is going to continue to release these toxic and hazardous materials into the air, water and soil, then it has the additional responsibility to name them. In the alternative, DOE/NNSA must stop all toxic and hazardous air pollutant emissions from LANL facilities and activities. Any new toxic or hazardous material created by LANL must have a proposed air emission limit, as well as discharge to surface water limit and soil concentration limit.

Further, the Expanded Operations Alternative would result in an increase of hazardous air pollutants by “up to 2.5 percent from the higher level of High Explosives Processing.” S-58.

In all cases of emissions of toxic and hazardous air pollutants and DU, the cumulative and synergistic impacts must be considered.

Evaporation of Tritium as Waste Disposal. DOE/NNSA states “the possible elimination of the RLWTF outfall to Mortandad Canyon if the auxiliary action to evaporate treated effluents were implemented.” We understand this to mean the continuation of using evaporation of these treated effluents into the air at TA-53.

Given the reduction of air monitoring at TA-53, can DOE/NNSA state with certainty that these emissions are being monitored? When will evaporation of treated effluents, including tritium, as a waste disposal method end? When will DOE/NNSA develop a waste treatment method for effluents that does not result in the involuntary exposure to humans and other living beings? This method of waste disposal is unacceptable. DOE/LANL must pursue an alternative method that imposes zero harm to humans and the environment.

Maximally Exposed Individual (MEI). DOE/NNSA recognize the need to move the LANL site-wide maximally exposed individual (MEI) under the Reduced Operations Alternative to near the firing sites at TA-36. The Reduced Operations Alternative provides for the shutdown of LANSCE, the largest emitter of radionuclides to the air. Regardless of which option is chosen, CCNS and EVEMG maintain the necessity for LANL to calculate and report a MEI for both LANSCE (generally at East Gate) and TA-36. Because of increasing public concern about the open burning and open detonation activities at the firing sites, as well as the recent leak at LANSCE, CCNS and EVEMG support the MEI being calculated at both places. We understand that the regulations only require one MEI, but given the diverse topography of the LANL site, the different emissions and concern about air quality over Bandelier National Monument, a Clean Air Act Class 1 area, two MEIs are needed at LANL.

Air Emissions Due to Increased Power Demand. DOE/NNSA must evaluate the increased air emissions due to the increased power demand under all the Alternatives. We find it ironic that the Department of **Energy** generates energy at LANL in old, inefficient and wasteful facilities. DOE/NNSA must include to option of using clean renewable energy sources such as wind and solar in the reanalysis for the new draft LANL SWEIS.

Air Emissions Due to Increased Commuting. DOE/NNSA must evaluate the increased air emissions as a result of the proposed hiring of more employees, contractors and subcontractors. The regional efforts for public transportation are commendable, however, DOE/NNSA must provide incentives so that people will get out of their cars and utilize the public transportation system, including Park and Ride and shuttles in Velarde, Dixon, Ojo Caliente and other rural areas where LANL employs concentrations of the population.

Bandelier National Monument. We remain concerned about LANL emissions impacting Bandelier National Monument, a Class 1 area under the Clean Air Act, and question the decision making process which would lead to proposing to operate a modern pit facility on the doorstep of a National Monument and historic treasure.