October \_\_\_\_\_, 2015

By email: [CRProjectEA@em.doe.gov](mailto:CRProjectEA@em.doe.gov)

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Department of Energy

Environmental Management, Los Alamos Field Office

3747 West Jemez Road, MS-A316

Los Alamos, NM 87544

Re: Public Comments about “Draft Environmental Assessment for Chromium Plume Control Interim Measure and Plume-Center Characterization,”

Los Alamos National Laboratory, Los Alamos, NM, DOE/EA-2005

Dear Staff:

I provide the following comments about the incomplete draft environmental assessment (EA) referenced above that proposes to pump 230 million gallons, or over 700 acre feet a year, from the drinking water aquifer below Los Alamos National Laboratory (LANL) to remove dangerous hexavalent chromium. After treatment, the water would be applied to the land surface by trucks or irrigation systems, re-injected into the aquifer, or evaporated.

1. It is disconcerting that the project focuses on removal of hexavalent chromium in the drinking water aquifer, but does not address the co-located dangerous perchlorate plume. Why waste taxpayer time, energy and funds to address one plume without addressing the second? The draft EA does not address this issue. DOE must explain why it is allowing the perchlorate plume to continue to migrate while proposing to address the chromium plume.

2. Not all of the information about the project is available for public review and comment. The draft EA references New Mexico Environment Department (NMED) ground water discharge permits that either has not been issued, or is on appeal to the New Mexico Water Control Commission.

The discharge permit (DP-1793) that is being contested allows the land application of 350,000 gallons per day of treated water by trucks or irrigation systems. The draft EA states that a 50-acre irrigation system will be used, but the document does not show where it will be located. Further, the draft EA also states that land application will be done in the floodplains of Mortandad and Sandia Canyon, even though the NMED discharge permit prohibits application in the floodplains.

NMED has stated that the second discharge permit (DP-1835) for re-injection of treated water into the drinking water aquifer will be released for public review and comment by the end of October. The comment period for the draft EA ends on October 23, 2015. In order to provide informed comments, the public needs to review both documents before providing comments on the draft EA. For that reason, I request that DOE grant a 90-day extension of time to provide comments on the draft EA.

3. I am concerned that the chromium and perchlorate plumes are co-located below Sandia and Mortandad Canyons, where Los Alamos County drinking water wells are located, and directly west of Santa Fe’s 13 deep drinking water wells and the Buckman Direct Diversion Project, which diverts Rio Grande water into the drinking water wells. DOE has not explained how the project will protect drinking water from cross-contamination in the regional aquifer.

4. The draft EA states that DOE will apply for a permit from the New Mexico State Engineer. DOE does not explain the type of permit, its purpose or the timing for applying for the permit. DOE must provide this information in a revised draft EA or in an environmental impact statement.

5. I am concerned that the storage basins for contaminated water will not be covered. As a result, birds and other wildlife will have access to the water. I request that the storage basins be covered.

Thank you for your consideration of my comments.

Sincerely,

Name:

Address: