November \_\_\_\_\_, 2018

By email to: Pam.Castaneda@state.nm.us, Hearing Clerk

 John.Verheul@state.nm.us, NMED Attorney

 Steve.Pullen@state.nm.us, NMED Ground Water Quality Bureau

Pam Castañeda, Hearing Clerk

New Mexico Environment Department

P. O. Box 5469

Santa Fe, NM 87502

Re: Public Comments about LANL Groundwater Discharge Permit

 DP-1793, No. GWB 18-05 (P)

Dear Ms. Castañeda:

I am deeply concerned about this discharge permit for groundwater remediation projects at Los Alamos National Laboratory (LANL).

I call on the New Mexico Environment Department to require the Department of Energy (DOE), LANL, Triad, and N3B to fully demonstrate that their proposed action is safe and that it does not contribute to harmful cumulative impacts on any form of life.

The permit must recognize and protect women, children, and the unborn that are the most vulnerable to toxic contamination. It is time to end the use of ''the reference man," a 150 lb. adult, white male, of western-European descent and custom, as the standard which determines allowable levels of contaminant exposure.

The permit must require that all workplans have more robust monitoring, including requirements for baseline data collection, mass loading monitoring, and comprehensive soil and water monitoring throughout the permit term, instead of only once at the end of the permit.

It does not make sense that the permit allows LANL to treat the polluted ground waters to less than 90 percent of the standards. The New Mexico standard for total chromium is 50 parts per billion (ppb). If LANL treats the water to less than 90 percent of the standard, it will be injecting contaminated waters of 45 ppb. Despite being asked on numerous occasions about treating waters to 25 ppb, or 12.5 ppb, or 0 ppb, LANL has not provided an answer. Basically, it will cost the same.

The permit should require the most protective standards for public health for all potential contaminants. In 2011, California issued a public health goal of 0.02 ppb. While this goal is being challenged, it is clear that California is on the path to establish a standard that is orders of magnitude more protective than New Mexico’s 50 ppb.

The University of California made this mess. They should be required to clean it up to the standards that apply in California.

I understand that mycoremediation, which uses mycelium (fungal material) to remove the total chromium (chromium 6 and chromium 3) from the waters, can cleanup the waters to zero pollution. The permit must require a timeline for the DOE and LANL to explore the use of mycelium to cleanup the chromium contamination so that field tests may be done in the summer of 2019.

It is time for the New Mexico Environment Department to require, and as a result, change the mindset of DOE and LANL to do more to cleanup the mess they have made on the Pajarito Plateau since 1943. To prevent more harm, a fundamental NMED goal should be to:

* protect the entire ecosystem in addition to portions of it,
* examine alternatives to achieve that,
* fully involve potentially affected people in decision-making,
* put in place robust monitoring programs for all environmental media and people,
* make all data available publically as soon as possible, and
* respond to early warnings.

It is time to use a precautionary approach to cleanup. That means that no more harm will be inflicted.

Thank you for hearing my concerns.

Sincerely,

Name and email address