March \_\_\_\_\_, 2020

By email to: [Jason.Herman@state.nm.us](mailto:Jason.Herman@state.nm.us)

Jason Herman, Ground Water Quality Bureau

New Mexico Environment Department

P. O. Box 5469

Santa Fe, NM 87502-5469

Re: **Public Comments about Discharge Permit 1481 (DP-1481) for URENCO USA**

Dear Mr. Herman:

I am concerned about the proposed renewal of the groundwater discharge permit 1481 (DP-1481) for the URENCO USA uranium enrichment facility located between Eunice, New Mexico and the Texas border in Lea County.

I appreciate the work the New Mexico Environment Department (NMED) has done to address many of the community concerns about the permit. Nevertheless, more needs to be done. This includes:

1. The permit should prevent pollution migration into the air, soil and groundwater. There are several places in the permit where abatement is described. All conditions in the permit should prevent pollution migration so that contaminants do not reach groundwater and require abatement.

1. The permit does not include any conditions to mitigate the serious public health problems, high cancer death rate, and low life expectancies in the southeastern New Mexico and Lea County areas.
2. The permit does not include any conditions requiring capture of toxic, hazardous or radioactive vapors emitted into the air during evaporation of the stormwater and industrial wastewaters.
3. The permit should designate monitoring wells as “upgradient” or “downgradient” so we can know if groundwater contamination is moving.
4. The permit does not include any conditions requiring treatment of the stormwater and industrial “waste waters” before they enter the evaporative ponds. There should be requirements for the use of bioremediation techniques, including mycoremediation (using mycelium for cleanup).
5. I am concerned about rainwater and stormwater flowing over and around the 14-ton uranium by-product cylinders (UBCs) that contain depleted uranium and are stored on a concrete pad without any covering. <http://nuclearactive.org/wp-content/uploads/2020/03/UBCs.jpg>
6. There is no indication about whether the sludge in the bottom of the ponds must be sampled for radionuclides and hazardous pollutants, or where the sludge is disposed. These points must be clarified.

Thank you for your careful consideration of my comments.

Sincerely,

[name and contact information]