

New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive, Building 1
Santa Fe, New Mexico, 87505-6303
By email to neelam.dhawan@env.nm.gov

[Month and Day], 2023

SUBJECT: Support for Comprehensive Cleanup at the Los Alamos National Laboratory

Dear New Mexico Environment Department (NMED):

I strongly support the Environment Department's mandate for comprehensive cleanup at the Los Alamos National Laboratory's (LANL's) Material Disposal Area C, an 11.8 acre dump consisting of seven unlined pits and 108 shafts of radioactive and toxic wastes. This mandate will help maximize protection of human health and the environment and ensure that our critical drinking water resources are permanently protected. I completely agree that the cleanup remedy for Area C must, in NMED's own words, "consist of waste excavation, characterization, and appropriate disposal of the buried waste," plus a soil-vapor extraction system to remove the underground plume of volatile organic compounds (which are typically carcinogenic solvents).

In 2021 LANL submitted its preferred "cleanup" remedy to the state Environment Department to "cap and cover" Area C. I strongly oppose LANL's proposal for "cleanup" on the cheap because it would leave the wastes permanently buried as a perpetual threat to irreplaceable groundwater. I also agree with NMED's assessment that "cap and cover" can only partially prevent the intrusion of deep-rooting plants and burrowing animals over time.

The total volumes and composition of radioactive and toxic wastes in LANL's unlined, underground waste dumps remain unknown. Similarly, the degree and depth of contaminant migration is still not fully known. For these reasons, NMED must compel LANL and the Department of Energy (DOE) to excavate and characterize the wastes for proper treatment.

LANL and DOE may argue that comprehensive cleanup of Area C waste will cost too much. That argument is hollow when the budget for nuclear weapons programs that caused the mess to begin with has more than doubled to \$4 billion annually. At the same time, cleanup has stayed flat at less than 6% of the Lab's total budget (or ~\$290 million).

The regional groundwater aquifer under Area C and LANL's other unlined waste dumps is a sole-source drinking water resource for some 300,000 people in communities throughout north-central New Mexico. Protecting clean water resources for the future is the strongest argument for total cleanup of LANL's radioactive and toxic waste dumps, for which Area C can be a leading model. The need for clean water is beyond debate. Clean water itself becomes priceless when not available. In addition, comprehensive cleanup at LANL can be an economic driver for the region, producing hundreds of high paying jobs while protecting the environment.

For all of these reasons, I strongly support NMED's mandate for full cleanup of Area C.

Sincerely

[name]

[Town or City and State]