

September 9, 2024

Ms. Neelam Dhawan, Acting Program Manager  
New Mexico Environment Department - Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Bldg. 1  
Santa Fe, NM 87505-6303  
[neelam.dhawan@env.nm.gov](mailto:neelam.dhawan@env.nm.gov)

Re: **Comments about the Sandia National Laboratories (SNL) – Mixed Waste Landfill (MWL) Second Five-Year Report (December 2023). It’s time for excavation and offsite disposal and remove the waste to an offsite location in consultation with tribes and local communities.**

Dear Ms. Dhawan:

Sandia National Laboratories and we agree – it is time to excavate the Mixed Waste Landfill (MWL) and process and remove the waste to an offsite disposal site in full consultation with communities and tribes along the transportation routes and the site. **The potential volatility of the MWL has communities in Albuquerque on edge** and we respectfully request that the comment period for the 5-year-review be extended so that we can dialogue with NMED about this very important issue.

**To protect the long-term public health and safety, the New Mexico Environment Department (NMED) must issue a timely order, called a Corrective Measures Implementation Plan (CMI Plan), for the excavation and offsite disposal of the toxic and radioactive chemicals contained in the 2.6-acre unlined dump.**

The Water Protection Advisory Board (Albuquerque, Bernalillo County and Governing Board) Annual Reports for 2016, 2017 and 2020 state **the dump contains a mixture of hundreds of types of classified and unclassified toxic chemicals and long-lived radioactive wastes.**

**Climate change brings a host of unpredictable risks including storms and flooding to the MWL. We are concerned the Five-Year Report did not fully address these risks.** According to 4.5.1, 'Risk Assessment Result for the Mixed Waste Landfill', sentences 12 to 14, 'The assessment did not consider risk posed by the waste constituents in the pits and trenches that have not been released into the environment.' Our major concern is such a constituent: metallic sodium. Canisters containing spent fuel from reactor meltdown experiments with up to potentially explosive 5 kg of metallic sodium in each were placed in Pits 35 and 36. Additional canisters containing spent fuel were placed in vertical small diameter holes drilled in the bottom of trenches but their locations are unknown. The canisters are subject to corrosion and explosion as occurred at a mixed waste facility in Beatty, NV in 2015.

In addition, we request **a full tribal consultation with impacted tribes** including the Pueblos of Isleta, Sandia, Laguna, Santa Ana, and San Felipe, which was not fully addressed in the Second Five-Year Review.

**In support of our comments, Sandia’s Second Five-Year Report states:**

- Planning and implementation for excavation is feasible and could begin by NMED issuing an Order for a CMI Plan;
- The preferred alternative is excavation;
- To protect workers excavation could be accomplished by conventional and remote-controlled robotic equipment; and
- Dangerous radionuclides, such as Cobalt 60 and Tritium have decayed to “acceptable” levels.

We note that NMED has recommended excavation of another dump in New Mexico – the Material Disposal Area C at Los Alamos National Laboratory. Addressing these leaking Department of Energy dumps is an important step to protect regional drinking water aquifers.

**Thank you for your careful consideration of our comments.**

Sincerely,

Signed & Printed Name:

Additional comment:

Address:

Email: