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Albuquerque NM 87104-4831
28 January 2006

Mr John Kieling, Program Manager
Hazardous Waste Bureau-NMED
2905 Rodeo Park Drive East, Bldg 1
Santa Fe NM 87505-6303



Dear Mr Kieling:

I have reviewed Paul Robinson's "Preliminary Sandia National Laboratories Mixed Waste Landfill Corrective Measure Implementation Plan and Fate and Transport Models: Comments and Recommendations." I am in agreement with all contained therein and as a result have further comments of my own. In addition, I am deeply disturbed by the implication of Robinson's comments that the plan was devised with economy more than safety in mind.

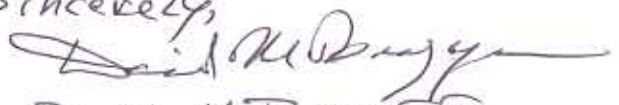
With regard to the biological transport of contaminants, I wish to point out that in addition to the numerous species of herbivorous, carnivorous, insectivorous and burrowing reptiles, mammals, birds and amphibians that might carry contaminants to higher levels in the food chain and spread them far beyond the landfill, there are many species of insects, spiders, worms and similar invertebrates that must be identified and the effects of their activities identified. In addition to surface flora, subsurface fungi, molds, bacteria and related species need to be taken into consideration. Soil bacteria that readily become airborne in high winds during drought conditions, as well as possible virus species, should have special attention. The agent that causes valley fever may well be subject to a high rate of mutation in the radioactive

environment of the landfill??

Human intrusion appears to be a far more serious matter than it has heretofore been considered. In this era of international terrorism and domestic hate organizations, the Mixed Waste Landfill might be considered an ideal location to create a "dirty bomb" by an explosion set off within or next to the materials deposited there. I can, for instance, imagine a hostile band tunneling into the landfill from outside the restricted area in order to create such an explosion.

I am told that New Mexico's oversight is limited to effects predictable within the next thirty years. There is one adverse effect possible within that time period that is indirectly subject to dangers that are believed to not reach a critical stage well beyond that limit. This is the effect of knowledge of inadequate attention to dangers to which the Mesa del Sol development might be subject. Even the threat of adverse impacts on the water, air and safety within the development area could seriously impact land values, thereby preventing the University of New Mexico from receiving full benefit from that project. It might even make the university and the state liable for any damages that do actually result.

I must, as a result, strongly urge that the Corrective Measure Implementation Plan and the Fate and Transport Models be reconsidered.

Sincerely,

David M Brugg